

Objection  
Number

Comments

1A

Good Afternoon,

Please note my objection to the application concerned in the reference number S13/006.

It is unthinkable that waste would be incinerated so low in an already polluted valley. Nature shows us on misty days how air sits in the bottom of the valley and I do not wish for myself or my 12 staff who work but a stones throw away from the proposed site to have to breath in this kind of air on a daily basis.

Calder Valley Skip Hire's ongoing persistence shows no moral interest in the people of our locale and as our representative council I call for an end to the threat of an incinerator once and for all.

Best Regards  
XXXXX

1B

Hello,

I am writing to voice my objection to the waste incinerator proposed in Sowerby Bridge.

It can be seen on a misty day how air sits in the bottom of the valley and as an employer of 12 people within a few hundred meters of the incinerator site I do not want to be exposed constantly to this level of pollution.

Asthma is prevalent and I know several people within my family and friends who are terrified about the proposal.

Nobody has a problem with Calder Valley Skip Hire incinerating their waste, however they clearly have the resources to commission a site away from the population centre. Their continued pursuit of the planning application shows their disregard for the wishes of the community. It is outrageous that the constant reapplications are even allowed.

Kind Regards

XXXXX

2A Dear XXXXX,

Thank you for your email.

As you will be aware the installation of an incinerator at this site has a long history. The Councillors copied into this email also will recall that I asked about the permit status in October 2023 requesting an update to any re-submission. I am therefore disappointed that this notification is the first news I have received in relation to a resubmission.

I have only briefly reviewed it, however, I cannot see that there is any explanation included as to how this application differs from the one rejected on Appeal last year.

I can see that it includes documents that included arguments that were rejected by the Inspector at that appeal eg that the previous planning appeal was a form of estoppel to the reconsideration of certain air quality matters.

I am sure that the Council will have been having discussions with the applicant in relation to this application and will have reviewed when accepting this application as valid the differences from the previous application.

Please then can I ask on behalf of the community, in order to enable a proper consultation to take place, for you or the applicant to provide an explanation as to what in this application differs from the application rejected on appeal last year.

Given that the Council has had this application for a while and the tight timescale for public responses, please can this be provided by Friday 23 February 2024.

In relation to the deadline for responses, I note that all the documents are not at present on the website when this email was sent. I do not think that the consultation period can start to run until all information is available to the public to enable them to respond. This is an essential requirement for a valid consultation. I also note on the website that there is no deadline for close of consultations it says "To be advised".

I look forward to hearing from you.

Kind regards

XXXXX

2B

SEE ATTACHMENT

3	<p>I would like to put in a request for this incinerator planning permission to be block for health reasons.</p> <p>I use to live 300yds as the crow flies up the valley side from the site and had experience of fumes and bad smells from the site over the years. The worst one being when there was a fire at the site. The smoke and smell lasted for days and it just sat in the air. We couldn't have a window open for nearly a week. I did initially submit pictures I took along with objections to there original planning application showing just how the environment had dealt with that smoke. The fumes from an incinerator would behave exactly the same I would think.</p> <p>A site for this type of use should be located well away from a densely populated area where it can affect people's lives. If you look at Allerton Waste Recovery Plant in between Leeds and Boroughbridge you will see a site located in a better area. This is a type location CVSH should be looking to use. It out in the country side away from the centre where the majority of the local population resides.</p> <p>Regards XXXXX</p> <p>Sent from my iPhone</p>
4	<p>Community Safety Staff:</p> <p>Having seen and read the latest set of paperwork for the above I can only conclude that CVSH and its legal representatives, apart from trying your patience, are simply hoping that its continued bombardment of applications will wear your department and several others down.</p> <p>Also the use of the phrase "perverse as well as procedurally unfair" to describe Inspector Mr John Woolcock's decision, apart from being insulting, smacks of panic.</p> <p>Whilst appreciating that you must be sick and tired of this saga please do not relax your stand on the matter.</p> <p>Kind Regards XXXXX</p>

5	<p>Good afternoon,</p> <p>As residents of Sowerby Bridge we object to the above environmental permit application. The previous application was considered by the Inspector Mr John Woolcock appointed by the Secretary of State who concluded that he was "unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment". It would appear that no material change has been made to either the permit application or the buildings where the incinerator is sited. It is without doubt that the location has not changed. It does not therefore make any sense to allow this environmental permit application as the decision by Mr Woodcock surely remains. We both firmly believe that the siting of an incinerator in the Ryburn Valley would have an impact on the health of the residents. We plead with the Council not to give in to the pressure no doubt being exerted by the applicant to approve this latest application.</p> <p>Kind regards XXXXX</p>
6	Which part of the sentence "We don't want it here" do they not understand?????

7

Dear sirs,

I am extremely concerned to hear of the renewed plans by Calder Valley Skip hire for a permit for an incinerator for general waste.

Sowerby Bridge is a heavily populated area. We live of XXXXX so not far away from the site of Calder Valley Skip hires planned incinerator.

With all of the heavily publicised cases of children who have died as a result of air quality we find it absolutely staggering that this issue is being considered again.

We have an 8 year old son XXXXX with a brain tumour and complex medical needs and disabilities as a result. XXXXX is on the vulnerable list due to accuse vulnerable respiratory issues as a result of an unsafe swallow and a history of severe chest infections. He is ventilated and often needs oxygen when poorly.

XXXXX loves to go out and about on the canal, to the park and out and about with XXXXX

The impact of an incinerator on the air quality in our area will only worsen his condition and could have a severe impact on his quality of life and long term life expectancy.

We would ask the Council to please reject Calder Valley Skip hires application for an incinerator.

Failure to do so is a failure to protect the health of the community and any vulnerable children like XXXXX. Calderdale Council owes a duty of care.

Please can Calderdale Council provide reassurances that they will prevent any such further application by Calder Valley Skip hire

Yours faithfully

XXXXX



8 I believe Calderdale Council should immediately refuse the new application by Calder skip Hire for an incinerator at Belmont Estate.

My opinion is based on the following:

The application is not significantly different to a similar application dismissed by the Government Inspector recently.

The local population are broadly against the application.

If Calder Skip Hire wish to object to the decision by the government appointed inspector they should challenge that decision in a separate court outside Calderdale Council.

The taxpayers of Calderdale should not have to pay for legal costs of an application only recently refused and overturned by an independent government appointed inspector.

XXXXX

9 Good evening.

I wish to make a representation objecting to the latest planning application from Calder Valley Skip Hire for an Environmental Permit to operate their Small Waste Incinerator at their Belmont Site in Sowerby Bridge.

The proposal will only increase unhealthy pollution levels in the Upper Calder Valley further and adversely affect human health.

I trust the comments above will be logged accordingly and taken into consideration when reviewing the latest planning application and you will keep me informed when the consultation process has concluded, and a decision made.

Kind regards,

XXXXX

10 I have made my objections to previous applications clear - that I am against the scheme on grounds of the health hazard to local people.

I still object on the same grounds to the new application.

Calderdale is topographically unsuitable for incineration of waste. The likelihood of the plant working efficiently 100 percent of the time is probably unlikely. If only a few hours of incomplete combustion goes on the pollution is likely hang in the valleys for days in certain weather conditions.

The area has been defined as an "Incised Plateau" where air can flow over the flat topped hills without refreshing the air in the valleys.

This description of our topography was given to the Halifax Scientific Society by a visiting lecturer on geology several years ago.

XXXXX

11

Reference: S13/006.

Address: Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.

I would like to comment with regard to the environmental permit request by Calder Valley Skip Hire (CVSH) Ltd. at their Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.

The company is yet again trying to push the incinerator on Sowerby Bridge, when the majority of residents are very much against it.

While the environmental evaluation was extensive it is now nearly 5 years old and since that report and Calder Valley Skip Hire being refused permission on their appeal, by Whitehall no less, traffic has increased substantially, and thus moves slower and creates a disproportionate increase in associated pollution.

Climate change was also not taken into consideration; the increased temperatures will cause people to use their vehicle A/C more, increasing exhaust emissions; the associated increased levels of sunlight and temperature will result in more smog from the higher levels of pollution.

Sowerby Bridge does not need another source of pollution, in this case one, which if the permit is granted, will have little to no real oversight of materials being incinerated or the resulting toxins being emitted.

If this permit is granted it must be under the provision that continuous independent third party, appointed by the council and paid for by CVSH, monitoring at strategic locations be put in place and the results made publicly available.

Sincerely

XXXXX

12

Dear Sirs

New Environmental Permit Application CVSH at Sowerby Bridge

I am writing to state my opposition to the granting of this environmental permit to operate an incinerator at the Belmont Site of CVSH Ltd on the following grounds.

1. Air Quality

The incinerator would contribute to the already polluted environment in this area (pollution caused by the high number of vehicles using the A58, exacerbated especially at times when the motorway is shut). The Ryburn Valley is an area where inversion occurs along its length, due to its topography, resulting in fog/cloud lingering along the valley bottom right up to the topmost parts of the valley sides. A chimney putting out exhaust from CVSH would contribute to the contamination of the air quality. This fact is a major contributor to residents' concerns over this incinerator putting contaminants into the mix. In the past, legal representatives etc., have put forward on behalf of CVSH, the air quality of Leeds/Bradford Airport which is totally different topography to the Ryburn valley and not even situated in the proximity of the Ryburn valley. This should have no bearing on the Ryburn valley.

2. Increase in Transport to the Site

Since the original application was put to the Council, and certainly during 2023, there has been an increase in large articulated lorries bringing waste to the site. The access and area of the site itself is not large enough to accommodate the bottle-necks of these entering the site. Many days there are up to three articulated lorries parked on Rochdale Road waiting for access to the site, causing problems for general traffic on the A58 (Rochdale Road). Movement on Rochdale Road is compromised; buses and other large vehicles have to wait for space in oncoming traffic towards Sowerby Bridge to get past these parked lorries. Cyclists – well I don't know how they negotiate this hazard. Cars are dodging oncoming vehicles to get round the blockages. Thus making the width of the road reduced and potential accidents happening.

3. Road Surface

The condition of the road surface of Rochdale Road at the top of CVSH access has become more deleterious over the last year, despite Calderdale Council having made a few attempts at patching the pot holes made by lorries turning into and out of the site. The road is now a combination of pot holes and patches which are extremely uneven, and a definite hazard for motor bikes, cyclists and cars.

4. Monitoring the Site at CVSH

This "small" site is handling greater quantities of waste as evidenced by the increased traffic to it. Calderdale Council and the Environmental bodies, who are supposed to be protecting the general population from environmental pollution in all of its spheres should be paying more attention to the increase of business being handled in waste management by CVSH and monitoring this carefully. It does not bode well that the current state of affairs will continue to escalate if an incinerator was in use at the site. CVSH are riding rough-shod over the whole area. The residents in this valley have in

the past had to put up with obnoxious smells from this site, and out of control fires when the Fire Brigade have been brought in to contain them. It gives me no reassurance that this company has any thought for the area in general and will continue to operate without a thought to the operation of an incinerator within a permit's constrictions. It has already been made clear in previous applications for a permit that the site is not suitable for this type of business, being in a steeply sided wooded valley with the river Ryburn running through it and in close proximity to the site.

I do believe it will be a travesty if CVSH are allowed an Environmental Permit for an incinerator, and that this ne application must be stopped by those in Calderdale Council and the Environment Agency. It is a shame that this matter has reared its ugly head yet again, when residents of this valley thought it had come to an end. It seems that CVSH will be continuing their fight against all to get their way.

It is up to our Councillors of the Ryburn Valley, our MP and all those in Environmental Health to put the lid on this once and for all, and give the residents of the Ryburn Valley peace of mind we are not going to be continuously held to ransom by CVCS.

Your sincerely

XXXXX

13

Dear Calderdale Community Safety,

I am writing to express my strong objection to the proposed planning permission for the construction of a highly polluting Waste Incineration Plant by Calder Valley Skips in Sowerby Bridge, ref: S13/006. As a concerned resident and advocate for environmental sustainability, I firmly believe that approving such a project would have detrimental effects on both public health and the surrounding environment.

The installation of a Waste Incineration Plant poses significant risks to air quality, soil integrity, and overall environmental well-being.

Incineration facilities emit a variety of harmful pollutants, including particulate matter, heavy metals, dioxins, and greenhouse gases, which can have severe health implications for nearby communities. These pollutants are known to contribute to respiratory diseases, cardiovascular problems, and even cancer, particularly among vulnerable populations such as children, the elderly, and individuals with pre-existing health conditions. The proposed location of said Incinerator is at the bottom of a valley with insufficient weather climate to blow away the smoke such a facility will spew out, which will obviously exacerbate the pollution.

Furthermore, the proposed Waste Incineration Plant contradicts the UK's commitment to reducing greenhouse gas emissions and transitioning towards cleaner, renewable energy sources. By perpetuating reliance on outdated and polluting waste management practices, this project undermines national efforts to combat climate change and achieve carbon neutrality.

In addition to environmental and health concerns, the construction and operation of a Waste Incineration Plant may also have negative socio-economic impacts on the local community. Property values could decline, tourism may suffer, and residents may experience increased noise pollution and traffic congestion due to the influx of waste disposal vehicles. Potential loss of the area being a popular filming location for TV and movies.

I urge the Local Planning Authority to prioritize the health and well-being of residents, safeguard the environment, and uphold commitments to climate action by rejecting the proposed planning permission for the Waste Incineration Plant. Instead, I encourage investment in sustainable waste management solutions such as recycling, composting, and anaerobic digestion, which offer cleaner, more cost-effective alternatives with minimal environmental impact.

Thank you for considering my objections to this matter. I trust that you will make a decision that reflects the best interests of the community and future generations.

Yours faithfully,

XXXXX

14	<p>It just seems strange to me that now ,if a decision in law goes against you, the learned barristers and lawyers, instead of acting like the responsible people ( we're led to believe they are.), throw their toys out of the pram and act like sulking children.</p> <p>Maybe they got their cue from the 'Post Office' who tried to get the judge removed because he wouldn't play ball. And as they themselves said, another inspector would not work, (for them),as he would come to the same outcome. So now they are appealing on a theoretical model which cannot be tested until its too late.</p> <p>The council (of course) speak with forked tongue as the indians would say, and we're still not sure of what hidden agenda they have.</p> <p>Needless to say, I am strongly objecting to this appeal, and from a laymans view, trying to overturn the inspectors decision amounts to trying to pervert the course of justice., but what do I know.</p> <p>XXXXX</p>
15	<p>I write to voice my disappointment that CVSH have once again applied for an environmental permit to operate an incinerator on their premises in Sowerby Bridge.</p> <p>Nothing substantial has changed since their appeal was dismissed by the planning inspectorate in 2023, apart from the fact that CVSH has seemingly sought a so called independent witness assessment to launch another application.</p> <p>I must vehemently object to the permit being granted, to spare Sowerby Bridge and its residents from the potential harmful effects of siting an incinerator in such a populous location.</p> <p>Yours sincerely,</p> <p>XXXXX</p>
16	<p>i wish to object to the proposal of a incinerator being built at sowerby bridge site. This will create more heavy lorry traffic, more air pollution ,more risk to childrens health ,especially as it is to be sited on the valley floor.</p>

17 To whom it may concern.

Dear Sir or Madam

I have recently received a letter from the office of Holly Lynch detailing that CVSH are once again applying for an Enviromental Permit to build a waste incinerator plant at their works in Sowerby Bridge despite their last attempt being turned down flat by the government inspector.

I wish to lodge our whole hearted objection to this new application due to:

1. The added pollution & unpleasant odours this would bring to the area due to the siting of the facility in the valley bottom surrounded by trees.
2. I CANNOT understand what has changed criteria wise since their last application was turned down??

My company make both incinerator & oxidiser units very similar to what CVSH are asking to install at their Sowerby Bridge site.

It is a nonsense to suggest that there will be no pollution, no enviromental issues & no odour issues to the local area if this plan was allowed to succeed.

Sowerby Bridge is a small town with a population that is already to large for its infrastructure & I can only see that the addition of an incinerator plant would only bring more heavy traffic to the already busy roads of our small town thus having a detrimental affect on the local area in the long run.

Hopefully the local authorities will see sense & turn this latest application down.

Yours sincerely

XXXXX



18 To Calderdale MBC Environmental Health,

I am emailing with regards to the current application for an Environmental Permit for Calder Valley Skip Hire to be allowed to operate a small waste incinerator in Sowerby Bridge.

I would like to oppose to the application as I live, and have lived in the area all my life.

More importantly, as a survivor of cancer, the following reasons are;

Incinerator Impact on Public Health and Property Value

1. Exposure to pollutants can cause respiratory issues, cardiovascular diseases, and cancer
2. Incinerators release harmful pollutants, affecting air quality and public health.
3. Burning waste produces unpleasant odours, disrupting quality of life.
4. Incinerator presence can lower property values, making it difficult to sell or rent homes.
5. Incinerators pose a risk of accidents, endangering residents and properties
6. Incinerators generate noise, causing disturbance to residents.
7. Living near a waste incinerator may lead to stigmatization, leading to social and psychological concerns.
8. Incinerators contribute to greenhouse gas emissions, causing soil and water pollution.

Kind regards,

XXXXX

19A Calder Valley Skip Hire Application for an Environmental Permit S13/006

Can you explain why the Council has validated a permit application that is not signed?

Can you tell me who will make the decision, council officers or elected representatives?

Why have objectors been given a shorter time to object as the council has delayed the publication of the application.

Furthermore why is the Council not upholding the decision by the Planning Inspectorate to refuse the application for the permit. The council should support the planning inspectorate's statement: "Unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment.

The guidance says:

4.5.1. The decision on the appeal is final. After it has been issued, neither the Secretary of State, nor the Inspector can consider further representations or make any comments on the merits or otherwise of the case.

4.5.2. The decision can only be challenged in the courts by judicial review.

It seems that by making a new application the company and the council are ignoring the decision made by the inspector.

I look forward to your response.

XXXXX

19B	<p>Application for an Environmental Permit S13/006</p> <p>Thank you for your email, why can't you answer my questions? On the website it says email you for further information. Can you provide me with the information? I was going to form my views based on your answers to my questions.</p> <p>Can you explain why the Council has validated a permit application that is not signed?</p> <p>Can you tell me who will make the decision, council officers or elected representatives?</p> <p>Why have objectors been given a shorter time to object as the council has delayed the publication of the application.</p> <p>Why is the Council not upholding the decision by the Planning Inspectorate to refuse the application for the permit.</p> <p>XXXXX</p>
20	<p>Dear Sir/Madam</p> <p>I would like to say that I am opposed to the application by Calder Valley Skip Hire for the application to operate a small waste incinerator plant at their Belmont Site.</p> <p>I am concerned about the detrimental effects on human health and the environment.</p> <p>Yours sincerely</p> <p>XXXXX</p> <p>Sent from my iPhone</p>
21	<p>I wish to formally object to the planning permission for this incinerator. I live downwind from the site and do not want fumes coming in my Direction</p>

22A Dear Sir/Madam

Please find attached my letter of objection to the New Environmental Permit Application by CVSH at Sowerby Bridge Belmont Site.

I trust you will be giving this matter your urgent attention,

Kind regards  
XXXXX

22B

It is with regret and dismay that I find that I am once more writing to object to yet another application for an environmental permit by CVSH in Sowerby Bridge. Is this matter never going to stop rearing its ugly head?!!

The arguments against the permit are as follows:-

- Air Quality

We already have excessive pollution in the Ryburn Valley. The A58 is the main road from the busy M62 to Halifax, via the village of Ripponden and the town of Sowerby Bridge. We have regular daily congestion on the approaches into Sowerby Bridge and this is not only at peak times of the day. The level of high traffic pollution is already an issue for the area WITHOUT the additional introduction of a 'small' incinerator by CVSH. At a time when the medical professions, and indeed the Government, are very aware that Asthma is a major noncommunicable disease (NCD), and is the most common chronic disease among children, that it would be grossly negligent for all those concerned to approve an Environmental Permit for CVSH Sowerby Bridge. Are you aware that just within the HX6 postcode we have OVER 25 Schools/playgroups and nurseries? Do we not have a responsibility, in fact a DUTY, as adults, parents and grandparents to ensure that our children have the best environmental start in life?!

The Ryburn Valley is also topographically unsuitable for an incinerator being installed. Along with its whole length the Valley steep sided and holds low fog/cloud regularly. Contaminants from a chimney (of any height!) will not dissipate but will fall in one or maybe many areas of the valley. In previous applications by legal representatives for CVSH they have compared Leeds/Bradford Airport to the Ryburn Valley and yet the topography of the Ryburn Valley is totally different! To compare the two is completely ridiculous and anyone who visits the two areas cannot fail to see the differences!!

- Traffic levels

As mentioned above, the Valley already experiences traffic level problems from an air quality aspect. However, the increase in the number of vehicles, especially HGV's, is also of great concern. There are already several 'bottle necks' on the A58 Rochdale Road, some of which involve schools. Even now we find articulated lorries queueing on the A58 Rochdale Road waiting to unload at CVSH and other local businesses, causing problems for the general traffic. The access to CVSH is unsuitable to take the size and quantities of lorries already using the site, frequently seen queueing on the main road in numbers that are proving an obstacle/bottle neck to general road users. The queuing has worsened over the last 18 months which must be due to an already increasing business by CVSH. Should they be successful with the incinerator application then there will be even more heavy goods vehicles trying to gain access and an even worse congestion on the main road, bringing it with the possible obstructions, not only to the general domestic traffic, but especially local buses and, more worryingly, to the Emergency Services and schools. Furthermore, despite lower speed limits having been introduced, speeding traffic is also a long running problem in the area, especially on the stretch of the road leading up to the CVSH entrance (locally dubbed 'the mad mile!'). Pedestrians, such as myself, and cyclists often feel 'to be taking their lives in their hands' when walking this stretch of road – the speed and backdraft from the lorries is

frightening and, on passing the central bollards in the road, the wing mirrors etc. found on the lorries/vans come scarily close to hitting persons! We should be looking to reduce traffic, not increase it with extending the CVSH business!!

- Monitoring of the site of CVSH

It is very important to have close monitoring on sites such as the one being applied for but I regret that I do not have any faith whatsoever that this will be forthcoming on this occasion. We have already had in the past fires at the Belmont Site, when it has been necessary for the Fire Brigade to be present at the site for days on end to ensure the fires have been totally extinguished. Not only is this a fire and environmental hazard but also a waste of the Fire Brigade resources. We hear all the time that the services supplied by Calderdale Council are stretched and can not provide the necessary levels required so how can we be sure that monitoring of the CVSH site will be adequate? I fear that it will only apply AFTER an accident has occurred and will not be an 'ongoing' service prior to an incident. What monitoring will there be to ensure that toxic waste is not being processed at the plant?

The site is adjacent to the River Ryburn and pollution at the site could well affect the River quality and any 'rubbish' could enter the river and lead to possible obstructions at the site, leading to flooding below and above the site.

Would monitoring of the site not only look at pollution and the nature of the waste being processed but also the noise levels? The A58 is already very heavily used by traffic and the noise factor is an ever-present problem. If the site is to be extended to include an incinerator what guarantees do those living near the site have regarding the hours being worked and the noise factor increasing?

CVSH have already shown that they do not take the local population into consideration. They ignore the continuous outcry and continue to pursue their own ends regardless. Are they really going to worry about how they go about running the incinerator? I fear not!

Despite my objections to the Environmental Permit Application by CVSH I do sincerely believe in recycling of waste whenever possible and recognise the importance of doing so. I just feel that there are better locations for a business of this nature and of the size proposed. Perhaps the answer for CVSH would be to relocate to somewhere that is more suitable instead of making life for those living in the Ryburn Valley a constant battle and worry?! Please let's bring this problem to a sensible 'once and for all' conclusion and let the people of the Ryburn Valley enjoy the beauty the Valley has to offer everyone.

Your sincerely

XXXXX

23

Dear Sir / Madam:

As per the letter received in the post am writing to oppose to Calder valley skip hire application.

Don't understand how they're even allowed to keep applying.

I have asthma and pollution in Sowerby Bridge is bad as it is - it is deeply concerning to think of an incinerator being added to the mix. It is very inconsiderate to the local residents.

Thanks Holly Lynch for your letter.

Thank you,

XXXXX

24

Dear Calderdale Council

I have received a letter from XXXXX dated 22nd February advising me that Calder Valley Skip Hire has again applied to operate their small waste Incinerator Plant in Sowerby Bridge.

I wish to object to this application.

The last time they ran an incinerator, there was a distinct low hum throughout Sowerby Bridge which could be heard during the day and prevented me from sleeping as I could hear it coming up through the ground when I was in bed. If it starts up again, it will be very detrimental not only to my health but to that of my neighbours.

Please do all you can to oppose their new application. Thank you.

Yours sincerely

XXXXX

25	<p>My views on the planning application by this or any other applicant to obtain an environmental permit for the SWIP or Waste incinerator plant are that it should NOT be issued as the air in Sowerby Bridge is already heavily laden with noxious fumes daily by vehicular travel by strangers and locals and other users as well as traffic making its way to or from the M62 motorway to other areas of Calderdale.</p> <p>Sowerby Bridge is heavily trafficked by slow moving and standing vehicles for much of every day. The many traffic lights which stop vehicles so that residents and other pedestrians may cross the road In the morning and evenings cause by necessity standing traffic and much pollution. After dark faster moving traffic is joined by heavy vehicles stocking the supermarkets and delivers to other parts of Calderdale. It doesn't stop even after midnight.</p> <p>Sowerby bridge has more than it's fair share of pollution, inconvenience and noise at this moment. It also accommodates the council tip, which is managed very well, but attracts additional vehicles to the area as does the railway station close by where many commuters park their car so they can sensibly train to work or elsewhere.</p> <p>There are many young people living here and many elderly. Neither group is a request for more pollution to taint young lungs nor do the elderly desire to further have theirs polluted till totally breathless!</p> <p>For the sake of all users of the air quality and movement in and through Sowerby Bridge please don't allow more and more dangerous toxins into our environment?</p>
26	<p>This application needs to be refused again , so that the air quality stays at least the same . The environmental cost will be too high , a vast increase in big wagon traffic , noise , air pollution .....</p>
27	<p>Dear Sir or Madam,</p> <p>I have read with concern about the plan to operate a SWIP on the Belmont Site in Sowerby Bridge. Whilst I agree in principle with the aim of recycling and reclaiming energy from waste, in my view it is not the best place to site this incinerator. The Ryburn Valley is already subject to the pollution caused by heavy traffic, often moving slowly in queues, thus increasing the amount of particulates in the air. A valley is not conducive to letting it blow away but more inclined to lock it in in my view. To add to this with a SWIP is only going to increase the risk of illhealth due to poor air quality. The chimney would not be sufficient to relieve the problem, and local people and the local environment would be better off without it. We need to do all we can to protect our air quality for the sake of the health and well-being of us all.</p> <p>Yours sincerely, XXXXX</p>



28

Hi,

I'm writing to advise of my frustration that Calder Valley skip hire have yet again submitted an application for a permit to operate their waste incinerator.

I and many other residents in the area have reported our feelings on this numerous times in the past. It will affect the health of residents and our environment and is totally unacceptable that it is being considered again after all the issues in the past.

Please don't allow them to get away with this. They clearly have no regard for the residents or the surroundings.

Yours faithfully

XXXXX

29

Good Morning,

I write to object to the SWIP at Belmont Industrial Estate in Sowerby Bridge.

I am a local resident just 600m away from the plant who is very concerned about the health and environmental impact that the plant will cause local residents and the beautiful surrounding nature.

The proposed plant is far too close to nearby trees and beautiful woodland containing so much wildlife. It is also within a valley meaning the exhaust will reach the majority of houses in the local area that are on higher land. All of the inhabitants will suffer the impact of this awful exhaust, the site is just not fit for this kind of installation.

On days where the wind is high and blowing in a certain direction the local town will be covered in exhaust which will impact the local economy. Who will want to go for a walk or sit out for a coffee in the area when this is happening? The smell will be abhorrent with the proposed waste that will be burnt, awful construction waste full of god knows what.

For the sake of human and environmental health for generations to come please do not approve the license to use the SWIP at CVSH.

XXXXX

Dear Sirs,

As a local resident, who has lived in Calderdale all my life, i am incredibly disappointed that Calder Valley Skip Hire (CVSH) have applied for an environmental permit to operate their Small Waste Incinerator Plant (SWIP)

Local residents have been fighting to stop these multiple planning and environmental applications from going ahead, due to the concerns of its potential effects on the local area, public health and the impact on the environment

I would like to comment on the following items which i am concerned about

1) Air Quality

I am worried about the impact of the operating SWIP on air quality to the area. The documents submitted details the SWIP will burn 2 tonnes of Refuse Derived Fuel (RDF) per hour, up to a limit of 10,000 tonnes per annum. I am concerned about how much CO2 this will generate, along with other pollutants such as NOx and particulates

Secondly, i note the environmental permit, makes no reference to the numbers of lorries bringing in waste to be burnt. Has CVSH calculated the additional emissions and pollution from this new traffic? I sincerely doubt any purported carbon emissions savings are accurate.

The location of CVSH's site, Belmont Recycling Centre on Rochdale Road just off the A58 is in a totally inappropriate setting for a SWIP. We all remember the air quality modelling from past applications by CVSH was based on an incinerator on the Moor not far from Leeds Bradford Airport. This is a totally different setting, being at the bottom of a deep, steep sided valley with many trees.

The 12M chimney stack, being surrounded by trees, as noted in the Cambridge modelling claims to not affect the SWIP. What is not modelled or noted is the commonly seen inversion of temperature, often resulting in low cloud, directly over the site. This has visibly trapped pollution from traffic when conditions were right, i don't think it would be unreasonable to assume it would be the same for the SWIP

I don't think its unfair for residents to want clean air to breathe.

## 2) Public Health

RDF fuel is made up of "business and domestic waste, which includes biodegradable materials, as well as plastics" - Clarity EU - <https://clarity.eu.com/knowledge/what-is-rdf-srf/>.

Inciner8's own document submitted to Calderdale Council by CVSH even states that RDF "starts off life as municipal waste, which is then cleaned and process to remove metals, recyclables, non flammable materials to leave mostly plastics, paper, cardboard and wood" CVSH-inciner8-i8-1000-rdf-uk.pdf

On the above basis, the fuel planned on being burnt in the incinerator includes plastic wastes. Burning plastic has been noted to be dangerous - The US National Institute of Environmental Health Sciences states "Burning plastics, in particular, can generate and release pollutants such as microplastics, bisphenols and phtalates- all toxins that disrupt neurodevelopment, endocrine and reproductive functions"- <https://factor.niehs.nih.gov/2022/8/science-highlights/burning-plastic>

How does this comply with planning condition of "non hazardous waste shall be used to fuel the SWIP (Condition 3)" - it might be non hazardous to handle, but based on the above, its hazardous when burnt as fuel.

I also note that in all the brochures for the Inciner8 I8-1000 Model incinerator, there is no mention of filtering out microplastics, bisphenols or phthalates. Can CVSH or their consultants comment on this? As these emissions, amongst others such as heavy metals, particulates etc will badly affect the local community's health. This is especially important when there are so many schools and nurseries in the immediate area.

## 3) Effect on the Environment

The operation of the SWIP , which was noted as 24H per day, Monday to Friday, will undoubtedly negatively effect the local environment. Particularly the animals which are listed as "priority species" such as brown hares, water voles and

the rare amphibians which live in the immediate areas, as noted by Calderdale Countryside and Forestry Unit's "Species Audit for Calderdale"

This disturbance would be in sound of operations i.e. lorry traffic to site, loading of incinerator, operation of incinerator and finally disposal of ash of the incinerator. As well as from emissions and other foreseeable issues coming from operation of the site

#### 4) Suitability Of CVSH To Operate SWIP

Calder Valley Skip Hire does not have the best reputation when it comes to running a waste recycling site. There have been publicised spills of waste and fires on site, which would to the casual observer, indicate they are poorly managed and run.

I suspect, if they were given the environmental permit to run the SWIP (which was installed on site before planning permission was determined) there will be more such issues.

The company directors clearly have zero regard for the community they operate their business in by continuing to push for the use of SWIP, when on multiple occasions the public has been completely against it.

Kind Regards

XXXXX

31

Hi

I would like to register my objection to the new proposal noted above.

This has been fully escalated on previous submission and decline appeals upheld.

The site local is not suitable for consideration due to the existing air quality issues that have been duly noted.

Any new applications would only make matters worse from an ecological point of view and be disastrous for the valley.

Kind regards

XXXXX

Sent from my iPhone

32

Dear Sir/Madam,

I'd like to register my objection to the renewed efforts by Calder Valley Skip Hire for an Environmental Permit to operate a waste incinerator in Sowerby Bridge.

The health hazard this would pose to local people is unacceptable. Smoke, fumes and damaging toxins simply won't be able to rise out of the steep, narrow-sided valley that the company's site is at the bottom of. We will breathe them all in, because they can't escape. When there's fog in the valley the same effect is clear to see.

There are schools and nurseries here. The risks to children's health are well-documented. We should be protecting them from an unnecessary development like this one. There are plenty of other companies who can operate incinerators in more suitable locations. There's no need that Calder Valley Skip Hire would be meeting that can't already be adequately fulfilled elsewhere by existing operators. This incinerator isn't needed.

The company is reckless with its safety and has had several fires on site. Their drivers have been observed speeding and using mobile phones at the wheel on the main road by the plant. Their poor and irresponsible record speaks for itself. They don't value public safety.

Residents, councillors, MPs - everyone with a stake in this area has made it abundantly clear they don't want this incinerator. It's been refused numerous times already. One company's wish to make a little more money can't possibly be considered more important than the wishes and concerns of thousands of local people.

This Environmental Permit application should be turned down.

Regards,

XXXXX

33 Having read the new planning submission by CVSH I have formed the following reason why it should be refused.

The primary argument put forward by CVSH revolves around a new software model which suggests that the incinerator could be safe.

My argument is based on the following.

To the best of my knowledge there is no comparable Incinerator based low in a steep sided valley located with a west East alignment.

Similarly there is no proven software model that can provide assurance that the Incinerator can be operated safely as there is no comparable working site in a similar environment.

It therefore represents a high risk to the health of families in the Calder Valley down stream of the Incinerator.

We have all just witnessed the effects of failed Corporate Responsibility with the Post Office are Calderdale Council prepared to take a similar high risk stance with the health of it's own constituents and agreeing to this application against the will of the people who live there and for an unproven Incinerator.

Why are Calderdale's Council so keen to support CVSH against the will of the people and to do so by delegating the decision to Head of Department rather than a full executive meeting. To many ordinary people and those who have on Corporate Boards experience this seems very irregular.

Yours  
XXXXX



34

XXXXX

I am writing to formally object to the application for the proposed incinerator plant in Belmont transfer station as referenced above. Our valley, known for its natural beauty and tree-lined vistas, is an inappropriate and unsuitable location for such a facility for several reasons:

1. Environmental Impact: The proposed incinerator plant poses a significant threat to the local ecosystem. The emission of pollutants and the potential for contamination of the soil and water sources could irreversibly harm the flora and fauna that thrive in our valley. too close to a river prone to flooding and rising water table.

2. Health Concerns: The release of toxic substances, such as dioxins and furans, could have detrimental health effects on the local population. The long-term exposure to these pollutants is associated with serious health risks, including respiratory issues and increased cancer risk., exacerbated by the valley having a weather inversion where the air is stuck in the valley where people live work and school.

3. Aesthetic Degradation: The visual impact of the incinerator plant would disrupt the scenic landscape that our community takes pride in and which contributes to the area's appeal for both residents and visitors.

4. Alternative Solutions: There are more sustainable and less invasive waste management practices that could be considered, which would align better with the community's values and commitment to preserving our natural environment.

I urge the environmental health officers to consider these objections carefully and to recognize the long-term implications that the approval of this application would have on our community and the environment. also i assume you have taken into account the previous decision from the government inspector less than six months ago.

Thank you for your attention to this matter.

Sincerely, XXXXX

35

Subject: Objection to Application Reference S13/006 for Proposed Incinerator at CALDER VALLEY SKIP HIRE LIMITED, BELMONT INDUSTRIAL ESTATE, REOCHDALE ROAD, SOWERBY BRIDGE.

Dear Calderdale Council,

I am writing to formally object to the planning application reference S13/006 for the proposed incinerator at Calder Valley Skip Hire, Belmont site, Sowerby Bridge. As a resident of this area, I have significant concerns about the impact of this development on our community and environment.

My objections are as follows:

1. Environmental Impact:

- o The proposed incinerator's location at the bottom of a populated valley is highly problematic. The valley is already heavily polluted due to road traffic, and adding an incinerator would exacerbate air quality issues.

- o We live in a very strict smoke control area, where only smokeless coal can be burned, the emissions from the incinerator could violate the purpose of these regulations to mitigate health risks from air pollution

- o May I draw your attention to the Sowerby Bridge Masterplan )(Sowerby Bridge Masterplan | Your Voice (westyorks-ca.gov.uk), which clearly states the following aims for Sowerby Bridge:

The masterplan aims to help develop a Sowerby Bridge that is:

Healthy - walkable and bikeable, with clean fresh air to breathe.

Attractive - a desirable place to live, work and visit, with distinctive character.

Sustainable - protecting and improving our spaces, with the future in mind.

Clearly an incinerator, close the centre directly contradicts these aims.

2. Ecological Concerns:

- o The incinerator's placement next to one of the few woodland areas, adjacent to the former Rishworth Branch Line, is deeply concerning. This woodland serves as a haven for dog walkers and wildlife.

- o The existing small incinerator in the area already emits horrendous smells, negatively impacting the few nature areas we currently have. Adding another larger incinerator would further degrade the natural environment and any enjoyment that residents including myself can take from the few remaining non-roadside walks around Sowerby bridge.

3. Health Risks:

- o The proposed incinerator's emissions pose increased risk to human health, especially considering that several schools are located on the hill above the valley. Children and staff in these schools would be directly affected by any pollutants released.

4. Cultural Impact:

- o Calder and Ryburn valley have provided a huge positive cultural impact for Calderdale, with programs like Happy Valley and Last Tango in Halifax to name but a few. Introducing a '10,000 tonne per year' incinerator within walking

distance of the centre of Sowerby Bridge, will blight the image and reputation of Sowerby Bridge and put off any potential visitors to the local area.

o Sowerby Bridge, offers a Gateway to several rural walks, with some amazing views and scenery of Ryburn valley from Norland Moor and Manshead moors, this would be detracted by any emission from a incinerator in the valley.

o As Calderdale Council, and Governments around the world strive to send the message that climate change and net zero is the most important challenge facing the human race, what would allowing an incineration plant in the heart of small-town show to any residents. I know personally for me; it would not make have any inclination to move away from fossil fuels for heating and motoring needs. Why would I spend hard earned money to invest in technologies to support government policy to protect the environment when there is an incinerator, burning God knows what less than a 5 minute walk from my house.

Adding to this, In light of the European context, the Roadmap to a Resource-Efficient Europe emphasizes waste reduction, recycling, and minimizing landfilling The proposed incinerator does not align with these goals.

I kindly request that you consider these objections seriously and thoroughly assess the impact of this development on our community.

Thank you for your attention to this matter.

Kind regards,

XXXXX

36	<p>Hello</p> <p>Please take this email as an objection against the installation of an incinerator by Calder Valley Skip Hire at Sowerby Bridge.</p> <p>Thank you</p> <p>XXXXX</p>
37	<p>I'm objecting to the incinerator in Sowerby Bridge. Utterly appalled it would even be considering knowing how damaging they are to our health, our vulnerable community, our children and our elderly.</p> <p>The valley holds fog. Don't let it hold smog! (Vehicles are bad enough without the incinerator)</p> <p>XXXXX</p>
38	<p>Calderdale Council</p> <p>I write to object to the Application for a permit to operate Schedule 13 small waste incineration plant.</p> <p>There are no words to convey how dismayed I am about the councils conduct in this overall matter over a considerable length of time, you have shown zero regard for your supposed residents.</p> <p>This is a resubmission of a REFUSED application, the situation is just ludicrous. The company did not appeal against the inspectors decision and instead are trying their chances via this route. To add insult to injury the council is shying away from voting and instead putting it to council officers – absolute disgrace. The evidence against this incinerator and the detrimental effects are endless. Put an end to this nonsense once and for all.</p> <p>I and my young family who live above the proposed incinerator have the right to breathe clean air, it is a basic human right. I regularly observe the smoke and mist lying in the valley bottom, inversion can stop waste gases dispersing.</p> <p>Furthermore I would like to remind you of your 3 strategic priorities listed in your Corporate Plan “We are addressing those challenges by focussing on three key priorities: reducing inequalities, building strong, thriving towns and tackling the climate emergency”.</p> <p>How does this application support any of these priorities, in fact works against them.</p> <p>Sort this ludicrous situation out once and for all and OBJECT to this application.</p> <p>XXXXX</p>

39

Good Afternoon,

Regarding the above application which I have recently been made aware of, I would like to object in the strongest terms.

I sent a longer letter of objection the last time the permit was applied for and would like to emphasise a particular point; as more time passes air pollution and the human health problems it causes are more understood and further regulated by government. Clean air zones were the preserve of the capital a few years ago, but not now. This is the current trend of development - to minimise air pollution, particularly in built up urban areas. Diametrically opposite to the proposed Incinerator. and its location.

I hope the cumulative response from the community, I live near the site, over the several applications can be considered. People do not have the time they perhaps had a few years ago in this time of flux.

XXXXX

40

Dear Sir/ Madam,

We wish to submit our objections to the application for a SWIP at the Belmont Site, Rochdale Road, Sowerby Bridge. My wife and I live XXXXX metres west of the proposed site at an elevation of 482 feet AOD in the lower Ryburn Valley.

On many occasions we can see the inversion cloud layer in the lower level of the valley. This inversion layer traps pollutants near the ground leading to poor air quality. Sowerby Bridge, and the lower Ryburn Valley, has major pollution problems

created by road traffic on the A58 that connects the district to the M62 motorway. There are many elderly people along with school students in the area that would be affected by further additional pollution. The inversion layer in the lower valley

extends for some distance north over the township of Sowerby Bridge, and south towards the village of Triangle. Fine pollutant particles would also be emitted from the SWIP flue that would be a major risk to health in the locality.

The inversion layer would trap the fine particles under the cloud in the valley bottom that is known to persist for several days. The site for the proposed SWIP could not be sited at a more unsuitable location in the narrow valley.

My wife and I strongly object to permission being granted for the proposed SWIP at Belmont Sowerby Bridge.

XXXXX

41 Dear Sir or Madam,  
I wish to lodge my objection to the application, Calderdale planning S13/006.

I have registered objections to previous applications by Calder Valley Skip Hire, and my reasons for objecting have not altered. The steep sided valley of Ryburn Valley is totally unsuitable for an incinerator to be placed on the valley floor, as dispersal of waste products would be severely inhibited by the topology. As it is mist, cloud and smoke can be seen regularly to lie in the valley bottom.

The modelling used by CVSH is not based on local weather patterns, so is totally irrelevant and should be discounted. This alone should discredit the application in my opinion.

I find it amazing that this application (in all its forms) is still being let to run and has not been shut down completely, the council has the opportunity to do the right thing this time and reject it. I urge your to do so.

Regards,  
XXXXX

42 Once again, the council taxpayers of Calderdale have to put up with yet another application from Calder Valley Skip Hire (CVSH).

The council should set its own limit on the number of times an applicant can keep coming back.

CVSH know that each time they reapply there will be a few less objectors & that the council is cash strapped so will not want to continue this costly exercise.

An utter disgrace – perhaps you should refuse them a haulage permit too !!

The same arguments that applied to the original CVSH application, still apply today (and to every further application made by CVSH), that a steep, narrow wooded valley that is very well populated is NOT the site for ANY incineration plant EVER.

The application should be refused, thrown out and the applicant told NOT to apply again.

Regards  
XXXXX

43      FAO: Chief Environmental Health Officer

I Wish to register my objection to the above Environmental Permit Application by Calder Valley Skip Hire I live in a residential area above the Belmont site and do not want an incinerator pumping out fumes and gases into our living space. We already suffer pollution from vehicles on the A58 road in the valley bottom and do not need this increasing Also we get industrial noise from the existing Belmont site operation and wish to register this. A further increase of business at this site would be detrimental to all residents in this area. The local area also includes four schools ( Sacred Heart, Ryburn, Sowerby Infants and Sowerby New Road and White Windows care home)

Please confirm receipt of this letter in due course

Best regards.   XXXXX

44      To whom it may concern

I am sending this email to register my objection to the application for the creation of an incinerator in sowerby bridge.

this is not a suitable site for an incinerator because of the steep sided and narrow valley that is surrounded by houses and schools and it will cause health problems for untold numbers of residents in the surrounding areas.

the applicants have also proved to be thoughtless and uncaring with their previous businesses in the Calderdale region and in my families opinions they will just the same with this project.

we hope that common sense will prevail refuse this application as was done previously.

Kind Regards

XXXXX

Dear Sir

I am writing to oppose the granting of an environmental permit to Calder Valley Skip Hire Ltd for the operation of a small waste incineration plant (SWIP) at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.

#### Site Location and Surrounding Environment

The proposed incinerator would be situated in a steep-sided valley, surrounded by trees and in extremely close proximity to densely populated residential areas, including three schools. The emissions from the incinerator would pose severe and unacceptable risks to the health and wellbeing of local residents, particularly vulnerable groups such as children and the elderly.

#### Previous Findings by the Government Planning Inspector

In the previous appeal decision, the government planning inspector unequivocally stated that the incinerator would be detrimental to human health. The current application shows a disregard for these critical findings and fails to address adequately the serious concerns raised by the inspector about the adverse health impacts on the local population.

#### Air Quality Concerns and Increased Traffic

The proposed incinerator site is located upwind of Sowerby Bridge, an area already designated as an Air Quality Management Area (AQMA) due to existing air pollution issues that exceed legal limits. Emissions from the incinerator would further exacerbate the poor air quality in the AQMA, endangering public health. The site's location in a valley would trap pollutants and prevent their dispersal, leading to dangerous concentrations of toxins in the air. Moreover, the incinerator would significantly increase heavy goods vehicle traffic, with the previous application stating 120 lorry journeys per day (60 in and 60 out). This additional traffic would contribute to congestion, noise pollution, and further deterioration of local air quality.

#### Inconsistency with Council's Stated Clean Air Goals and Tourism Strategy

Calderdale Council has publicly stated its commitment to improving air quality for all residents through its 'Let's Clear the Air' campaign and Air Quality Action Plan. The council has set goals to reduce air pollution and create a healthier



environment. However, permitting this incinerator would be in direct conflict with these stated clean air plans and emission reduction targets. It would undermine the council's credibility and efforts to protect the health of local communities from the harms of air pollution.

Furthermore, Sowerby Bridge and Halifax have experienced a surge in tourism over the last few years due to popular TV shows filmed in the area, such as Happy Valley, Last Tango in Halifax, and Gentleman Jack, as well as the rejuvenated Piece Hall hosting concerts by major artists. The incinerator runs counter to this thriving tourism industry and the council's efforts to promote a sustainable, tourism-based economy that benefits the entire community. The council should prioritise supporting local initiatives that capitalise on this tourism potential rather than allowing a polluting incinerator that would detract from the area's appeal and economic growth.

### Legal Duties and Obligations

The council has a legal obligation to apply the precautionary principle, which requires taking preventative action in the face of uncertainty and shifting the burden of proof to the proponents of an activity. The known risks associated with incinerator emissions necessitate refusing the permit.

Under the Public Sector Equality Duty, the council must consider the discriminatory impact of its decisions. This incinerator would disproportionately affect vulnerable groups, and the council must mitigate any inequality.

Permitting the incinerator could breach residents' right to life and health under the Human Rights Act 1998. The state has a positive obligation to protect citizens from environmental harms.

The council's commitment to clean air has created a legitimate expectation among residents. Granting the permit would frustrate this expectation and be grounds for legal challenge.

### Severe Environmental and Health Risks

Incinerators are known to emit highly toxic substances that accumulate in the environment, causing long-term damage to health and ecosystems. The precautionary principle must be applied to prevent these unacceptable threats.

### Alternative Sustainable Waste Management Solutions

The council should prioritise sustainable waste management methods rather than permitting polluting incineration in a densely populated steep sided valley. Incineration undermines recycling, releases greenhouse gases that contribute to climate change in the midst of a climate emergency, and perpetuates unsustainable waste disposal.

In conclusion, I strongly urge Calderdale Council to reject this permit application. The proposal is contrary to the planning inspector's findings, inconsistent with the council's clean air goals and tourism strategy, and poses severe risks to the environment and public health. The council has a legal duty to protect residents, support sustainable economic growth, and lead the transition to cleaner waste management.

I trust that the council will make the responsible decision to refuse the environmental permit, maintain its commitment to clean air, and foster a thriving, tourism-based economy for all.

Yours truly

XXXXX

46 Good evening,  
I am emailing to object to the incinerator in Sowerby bridge. The application has been rejected once and Calder valley skip hire did not appeal this decision. The submission of a new application provides no assurances the air will not be polluted. Considering the amount of primary schools in the vicinity and secondary schools I am appalled this is being considered when clean air zones should be being looked into where children are frequenting schools. Bradford council take air pollution very seriously and have dedicated clean air zones following very worrying research into childhood asthma and hospital admissions for the same conducted by Born in Bradford researchers. Calderdale should be following Bradford's lead. <https://airqualitynews.com/health/born-in-bradford-using-evidence-to-influence-policy-improve-health-and-reduce-inequality/#:~:text=It%20is%20estimated%20that%20a,a%20result%20of%20air%20pollution.&text=BiB%20research%20has%20been%20crucial,weight%20of%20babies%20in%20Bradford>.

This email is to object against an incinerator in Sowerby bridge, a valley with dense trees surrounding it thus not allowing the harmful gases to be dispersed.

Shame on you Calderdale!

XXXXX

47 We object to CVSH wanting an incinerator in Sowerby Bridge.

We SAY NO TO WASTE INCINERATOR IN RYBURN VALLEY

We live in Norland and don't want smog, pollution along with disgusting smells which will linger in the valley and drift up and over the hill sides.

The chimney will be unsightly in this lovely green valley which we all live in.

Regards

XXXXX

48

I would like to formally object to the planning application for an incinerator in the valley of Sowerby Bridge.

I live directly opposite on the opposite side of the valley & these are the reasons for my objection.

a) The noise, I can already hear all times of day & night bangs where they drop skips, regularly. It's very noisy, there is also a long long high pitched tone that can be heard for miles across the valley, people are regularly complaining on the local facebook groups. It's such a tone it gives me a headache, I suffer from cluster headaches so this just compounds my situation.

b) The air pollution is already at an all time high during the warmer months, there are numerous schools within the vicinity of which air pollution will affect them, the asthma rates within this valley are also extremely high.

c) The chimney is said to be a certain height, however, we as locals already know that smoke & clouds do not drift due to the high nature of the valley, it just sits there & doesn't move. So the pollution is stagnant within the valley.

d) The traffic is absolutely horrendous at all times of the day throughout the valley especially when the M62 is closed, Sowerby Bridge is a relief road for the motorway. It is extremely congested adding to the air pollution, I'm unsure how many lorries will add to this already exacerbated situation.

e) The noise of lorries 24/7 will be horrendous, they bang & given the noise pollution in the valley, noise reverberates hugely, I struggle to sleep as it is but 24/7 lorries banging their skips will compound the situation.

f) I have zero confidence in CVSH, they had a fire within the last few years & because of the nature of the valley the smoke & smell & pollution took days to recover, the environment agency was aware of this, we were told to keep our windows closed for days, this affected hundreds.... HUNDREDS of households & schools.

g) On a personal note this will affect the value of my property. The owner of CVSH doesn't live in this valley & doesn't have to tolerate all of the noise, smell & air pollution.

I am qualified to make these comments because I live on the valley side directly opposite. I have endured years of noise /air pollution and this suggestion is absolutely ludicrous.

XXXXX

49

From XXXXX

Re planning application S13/006

I would like to strongly object to this planning application on environmental grounds.  
Sent from my iPhone

50

I would like to strongly object to the planning application on environmental grounds.

XXXXX

51

I would like to add my objection along with all the others in the area against the request for a permit to operate an incinerator.

The science shows this type of incinerator so close to properties in a dip in the valley would be detrimental to health for those closest to the site but also wider afield.

I know from sites in other towns and Cities that the particles cause an increase in asthma and other lung related health conditions.

Maybe the company could look into greener waste disposal options.

The previous proposal was rejected on appeal, there does not appear to be anything different this time.

Please consider the wishes of local people who vote for our counsellors to be our voice and look after our wellbeing.

Many thanks  
XXXXX

52	<p>Dear Sir/Madam,</p> <p>I am writing to object to the application to install a new incinerator in Sowerby Bridge. I am a local resident and am concerned by the likely impact on air quality and the local environment should this application be approved.</p> <p>Sowerby Bridge is a highly populated residential area in a valley where particulate matter in the air is less likely to be carried away by weather systems than sites on higher ground. There are several schools and numerous private residences and businesses, parks and other leisure facilities in the area. Research shows that high air pollution and poor air quality is a factor in negative health outcomes for populations, particularly for children and people with existing lung conditions. I believe air quality is already a concern in this area, and the people of Sowerby Bridge should not be further burdened with additional pollution.</p> <p>There are also two waterways running through Sowerby Bridge, both the canal and the river. Environmental impacts therefore are likely to not only affect just this local area but be carried downstream.</p> <p>This is not a suitable area to install incinerators and I very much hope that this application will be refused, as I understand it has been previously.</p> <p>Best wishes, XXXXX Local Resident</p>
53	<p>I object to the proposal by CVSH to build an incinerator in Sowerby Bridge. They have had their planning permission refused on the grounds of pollution near housing and schools and this decision should be upheld.</p>
54	<p>I write to object to the proposal submitted by Calder Valley Skips seeking an environmental permit for the operation of an incinerator in Sowerby Bridge reference Calderdale planning S13/006.</p> <p>Calder Valley Skips refusal to accept the decision of the inspector appointed by the Secretary of State is a complete waste of resources and is undemocratic.</p> <p>They cannot change the shape of the valley or the existence of roads and other pollution sources which already lead to environmental issues now. The site is totally unsuitable.</p> <p>Their application should be dismissed.</p> <p>XXXXX</p>

55 I simply wish to voice my comments regarding the above application to join hopefully thousands of other to ensure this application is finally thrown out. The proposed site is totally inappropriate given the prevailing winds and will only potentially disadvantage local communities healthwise but the additional heavy traffic linked to such a business, which would inevitably increase, would have an adverse effect On road pollution and infrastructure. Please ensure this application is dismissed for good.

XXXXX

56 I wish simply to add my voice to hopefully the thousands who wish to see this application finally thrown out. Due to the prevailing winds this proposed operation would have an adverse effect not only on health in the area but on traffic pollution and infrastructure. Please ensure this application is finally thrown out for good.

XXXXX



XXXXX

Dear Sir or Madam,

I see an application for an Environmental Permit for a waste incinerator has been made by Calder Valley Skip Hire. I hope what I say may help your decision making.

The Calder and Ryburn valleys in Sowerby Bridge are deep, narrow and steep sided. This configuration leads itself on clear nights to the accumulation of cold air in the valley bottoms. Heat is lost from land surfaces on cloud free nights by radiation, and the air touching this cold land is itself chilled, becomes more dense, and drains into the valleys. As it cools the relative humidity of this air rises and if it reaches 100% - dewpoint- condensation occurs with fog forming. Such a fog is called a radiation fog. The Calder and Ryburn valleys could not have been designed better for this process to occur. The fogs can be seen regularly in autumn and winter from valley side vantage points in Warley and Norland.

In these conditions the air in the valley is colder than air higher up in the atmosphere. This is called a temperature inversion. Usually air temperature decreases with altitude, the rate of this decrease is called the environmental lapse rate. When a temperature inversion develops as a result of radiation it is said to create a 'lid' which prevents air from lower down in the atmosphere continuing to rise by convection, because as it rises it expands, cools adiabatically, and becomes colder and therefore denser than the air surrounding it. This lower air, together with whatever pollutants it has picked up on its way, is trapped beneath the lid.

Until the introduction of clean air legislation such trapped air included smoke from coal fired domestic and industrial sources. It still today contains emissions from motor vehicles, solid fuel appliances such as wood burners, oil fired boilers, garden bonfires and whatever else we choose to burn. While not so damaging to respiration as the smogs of the 1950s and 1960s which we used to endure, such polluted air is a cause of much respiratory disease in the very young and very old. There seems little reason that we should wish to aggravate the problem by adding the discharge from a waste incinerator with a permit to operate 24 hours a day.

Yours faithfully,

XXXXX

58	<p>Hello, I would just like to object to the proposed incinerator in Sowerby Bridge by Calder valley skip hire. Calderdale planning# S13/006</p> <p>The safety concerns that were raised originally have not been addressed adequately and as such there is no possible way that this application should be passed.</p> <p>The fact that this application has got as far as it has is also very concerning and raises questions of public officials who are trusted to safe guard the community.</p> <p>XXXXX</p>
59	<p>Hello, I would just like to object to the proposed incinerator in Sowerby Bridge by Calder valley skip hire. Calderdale planning# S13/006</p> <p>The safety concerns that were raised originally have not been addressed adequately and as such there is no possible way that this application should be passed.</p> <p>XXXXX</p>
60	<p>Hello, I would just like to object to the proposed incinerator in Sowerby Bridge by Calder valley skip hire. Calderdale planning# S13/006</p> <p>The safety concerns that were raised originally have not been addressed adequately and as such there is no possible way that this application should be passed.</p> <p>The fact that this application has got as far as it has is also very concerning and raises questions of public officials who are trusted to safe guard the community.</p> <p>XXXXX</p>

61

XXXXX

Dear Sir or Madam,

I see an application for an Environmental Permit for a waste incinerator has been made by Calder Valley Skip Hire. I hope what I say may help your decision making.

The Calder and Ryburn valleys in Sowerby Bridge are deep, narrow and steep sided. This configuration leads itself on clear nights to the accumulation of cold air in the valley bottoms. Heat is lost from land surfaces on cloud free nights by radiation, and the air touching this cold land is itself chilled, becomes more dense, and drains into the valleys. As it cools the relative humidity of this air rises and if it reaches 100% - dewpoint- condensation occurs with fog forming. Such a fog is called a radiation fog. The Calder and Ryburn valleys could not have been designed better for this process to occur. The fogs can be seen regularly in autumn and winter from valley side vantage points in Warley and Norland.

In these conditions the air in the valley is colder than air higher up in the atmosphere. This is called a temperature inversion. Usually air temperature decreases with altitude, the rate of this decrease is called the environmental lapse rate. When a temperature inversion develops as a result of radiation it is said to create a 'lid' which prevents air from lower down in the atmosphere continuing to rise by convection, because as it rises it expands, cools adiabatically, and becomes colder and therefore denser than the air surrounding it. This lower air, together with whatever pollutants it has picked up on its way, is trapped beneath the lid.

Until the introduction of clean air legislation such trapped air included smoke from coal fired domestic and industrial sources. It still today contains emissions from motor vehicles, solid fuel appliances such as wood burners, oil fired boilers, garden bonfires and whatever else we choose to burn. While not so damaging to respiration as the smogs of the 1950s and 1960s which we used to endure, such polluted air is a cause of much respiratory disease in the very young and very old. There seems little reason that we should wish to aggravate the problem by adding the discharge from a waste incinerator with a permit to operate 24 hours a day.

XXXXX

62

To who it may concern;

I wish to have my feeling formally know. I strongly object against the proposal for an incinerator at Sowerby bridge.

The valley is a downward v making any "fall out" add to the pollution already in the valley bottoms, especially on cooler days that can already to seen.

The Heath concern is massive. So many people and animals would be affected by the burning of waste 24h a day for a 5 day straight.

The proposed location has no major improvements on the last location which was thrown own by the government on environmental grounds. The location now will have dozens of primary schools and two secondary schools within a five miles radius, how is this safe??

I have asked the local MP's to once again step in and help.

Please do not put people Heath at risk.

I personally already have issues with my lungs from Asthma I do not want them made worse by the incinerator burning away, creating fumes which will linger in the air.

Once again I OBJECT TO THE PLANS

XXXXX

Dear CMBC,

I am writing to object to this permit being issued to Calder Valley Skip Hire. I personally objected to their planning application to install an incinerator at this site and was saddened and concerned when it was granted. I was glad when they were not permitted an environmental permit and am horrified that they are allowed to apply again so soon.

I do not see that anything has changed since their last application.

1. The company has no better record of maintaining the conditions set at their other site and the fact that the environment agency is too overwhelmed to check regularly is not a reason to ignore their flouting of the rules.
2. Calderdale MBC does not have the resources to oversee this site to ensure conditions are met.
3. The site is still at the bottom of a steep sided valley which regularly sees inventions and the height of their smoke stack will not prevent the smoke from gathering in the valley. The valley is still an area of poor air quality and this will only make matters worse.
4. The site is not easily accessible for large traffic and will only make the roads in and around Sowerby Bridge worse. Causing problems for motorists and increasing the poor quality of the air.
5. The site is next to a nature reserve and we should not be encouraging the contamination of the reserve.
6. The site will disperse its smoke directly towards a junior school which is questionably wrong.

This site is not wanted by the local community, not because we are being "nimby" but because it is in the wrong location and will potentially permanently damage our children and cause health issues for others. If the company could find a better site I would support them.

XXXXX

64

Hi,

Regarding the application for the above in the interests of fairness shouldn't there be a copy of the last planning inspectors decision notice when he rejected the applicants appeal about this last year?

Also I've heard XXXXX on a couple of occasions say there would be a public consultation on this matter - but I've not been consulted and I live only XXXXX metres from the site.

Thanks

XXXXX

65

I would like to object to the application by Calder Valley Skip Hire for an environmental permit to operate a waste incinerator in Sowerby Bridge.

I live in the area, my son and daughter go to school less than a mile from the site and I believe that breathing clean, unpolluted air is a basic human health right which would be put in jeopardy by the incinerator.

Thank you

66

Hello,

I am informing you that I am against the proposed waste incinerator planned for Sowerby Bridge. The waste will be damaging for my new family and pollute our air.

Regards,

XXXXX

67 To who it may concern,

I wish to object to the proposed incinerator which Calder Valley Skip Hire have applied for. This would affect the air quality of Sowerby Bridge and surrounding areas, my daughter attends a nursery nearby. I am also a local resident in Rishworth.

This matter has already been decided at a planning appeal and the incinerator was refused last year and therefore, the results of the planning process should be followed and again the incinerator should be refused on grounds of public safety/health.

The planning inspector determined that the gases could not be safely dispersed and therefore, the request for an incinerator was rejected. Nothing has changed since the planning inspectors comments and therefore, there is no valid reason for overturning the planning inspectors decision. To do so would be an abuse of due process.

XXXXX

68 Good afternoon,

I would like you to take this email as a formal opposition to the application reference above for the installation of an incinerator at the site. This is principally due to the fact that the combination of air pollution in the valley will increase and have a negative impact on both children and adults health and also the fact that the noise from the plant will increase due to the proposed 24hr operating of the incinerator.

The plant has operated without an incinerator for many years and therefore the only logical reason for them to put the people of the Ryburn valley at risk is solely due to monetary gain and as a result they are not considering that it will be a blemish on the area which is steeped in history and is a big tourist draw for the town.

I work in healthcare and do not wish to see a wonderful valley spoilt and its occupants health deteriorate all for a business to gain financially. I understand the need for progress however this is not the correct site for an incinerator.

Kind Regards

XXXXX

69 I wish to strongly object to the incinerator plans for Sowerby Bridge we have over polluted Air quality with all traffic coming through the area without further more serious problems No No No !  
XXXXX  
Sent from my iPhone



Environmental Permit application from Calder Valley Skip Hire, Reference: S13/006

Dear Sir/ Madam

I am writing to express my strong objection to the proposed permit for an incinerator in the Belmont Site in Sowerby Bridge. As a resident living nearby, I am deeply concerned about the potential health and environmental hazards that such a facility could pose, particularly given its placement at the bottom of a valley.

One of my primary concerns is the impact of air pollution on the health of myself and my community. I suffer from asthma, a condition that is exacerbated by poor air quality. Placing an incinerator near residential areas, especially in a valley where pollutants can become trapped and concentrated, greatly increases the risk of respiratory issues and other health problems for myself and others in the community.

Furthermore, the environmental consequences of incineration cannot be overlooked. Not only does the process release harmful pollutants into the air, but it also generates ash and other waste products that can contaminate soil and water sources. Given the delicate ecosystem of our valley, introducing such pollutants could have devastating and long-lasting effects on local wildlife and vegetation.

I urge you to carefully reconsider the decision to grant a permit for the construction of this incinerator. I implore you to prioritize the well-being of residents and the preservation of our environment by rejecting this permit application.

Thank you for considering my objections. I trust that you will make the responsible and ethical choice in this matter.

Yours Sincerely,

XXXXX

71

XXXXX

Environmental Permit application from Calder Valley Skip Hire, Reference: S13/006.

Dear Calderdale Planning.

I am writing to express my deep concern and objection to the proposed planning application for the Environmental Permit from Calder Valley Skip Hire. As a resident deeply invested in the well-being and sustainability of our area, I find the idea of allowing such a facility not only troubling but also potentially harmful to the health and environment of our community.

Furthermore, the location of the proposed incinerator raises serious concerns about its proximity to residential areas, schools, the river and wildlife, also the terrible bottom of the valley position. The potential noise, odour, and traffic congestion associated with the operation of such a facility would undoubtedly disrupt Sowerby Bridge and surrounding area! It's too busy and polluted now without adding to it and further exacerbating the situation.

In light of these concerns, I would ask you to decline the application for the permit so we can safeguard the health, well-being, and prosperity of our community for generations to come.

Thank you for reading my objections to the proposed incinerator environmental permit. I trust that you will act in the best interests of our community and prioritize the health and safety of its residents.

Yours Sincerely,

XXXXX

72

Good afternoon

I am writing to object to the granting of an environmental license for CVSH to establish an incinerator.

The air quality model is not using the local weather and there is a very real danger of gases lying low in the valley under certain weather conditions.

Air quality is of paramount importance for those people who live in our lovely valley and is already challenged by Rochdale and Burnley Road traffic. It is not a progressive move forward to add to this burden.

Please do not allow CVSH to establish an incinerator.

Thank you

XXXXX

73	<p>XXXXX</p> <p>We profoundly disagree with the application for the environmental permit to operate a waste incinerator on Rochdale Road Sowerby Bridge, we live almost directly above where this proposed incinerator is planned at Calder Valley skip hire. Our family of four adults all agree that in this day and age with the knowledge we now have of health risks caused by pollution we definitely do not want this to go ahead on our door step.</p> <p>XXXXX</p> <p>Sent from my iPad</p>
74	<p>Dear sir or madam,</p> <p>I wholeheartedly reject the proposal for an incinerator in Sowerby bridge. Having researched the proposal, I cannot see how this would benefit the area or how it would not have a negative environmental factor. I have 2 very young children and chose to live in this area for its natural beauty and out of city upbringing. I do not want their health put at risk which it would be were an incinerator to be approved.</p> <p>Sincerely</p> <p>XXXXX</p>
75	<p>Hi</p> <p>I object to the incinerator on the grounds that the area is too low and will pollution even worse that it is currently you only have to look at the days around the 5th of November and how the smoke lingures in the valley bottom.</p> <p>With the NHS struggling as it is give the permission for this incinerator will make pressures worse as more residents of the area will come down with breathing difficulties.</p> <p>Furthermore the company wanting to build this has been told to tidy his act up and from recent post and pictures I've seen this has been ignored so I put it to you do you think they'll stop the incinerator on a weekend</p>
76	<p>I wish to opposes the granting of an Incinerator licence for Calderdale Valley Skip Hire at the Belmont site in Sowerby Bridge.</p> <p>Regards</p> <p>XXXXX</p>

77	<p>Myself and my husband live on the opposite side to the CVSH at XXXXX, we are quite elevated and wouldn't be far off the chimney height when waste is dispersed. We are concerned about the air quality and noise from this site . We also did submit our thoughts on the last application.</p> <p>This is a lovely valley with people and wildlife that could be affected.</p> <p>Please accept this email as our way of wanting to oppose this application from CVSH .</p> <p>XXXXX</p>
78	<p>Morning,</p> <p>I'm emailing in regards to the Calder valley skip hire application to open an incinerator at there site in Sowerby bridge. I disagree with this and I fully believe they should not be able to go ahead.</p> <p>I live on XXXXX so not far at all from where they re based and I have 3 children and 2 dogs, we often walk along the old railway too and I personal think this would not only affect me, my children and pets along with lots of other people, the local wildlife too!</p> <p>Sowerby bridge is already bad with pollution from how busy it is and the constantly flow of traffic without adding an incinerator! I'm shocked that they've been refused before and have been allowed to submit a permit again. it makes me very concerned for my children's health along with my own, 2 of my children already suffer with asthma. I'm worried how this will affect them and all the very local schools to this site.</p> <p>Thank you</p> <p>XXXXX</p>

79

Good morning,

As a resident of Soweby bridge, please add me to the list of objectors for the incinerator

Like most other people who live in Soweby Bridge, I do not want to suffer from the health consequences of them burning waste.

Furthermore the bad smell will have a negative affect the wider economy as it may lead to a fall in house prices which again is not fair.

It's ridiculous they even got planning in the first place.

Please add my name to the list of objectors but I want to keep my identity confidential if possible.

Thanks

Kind Regards,  
XXXXX

80 Dear Sirs

As a resident of Norland I strongly object to the proposals by Calder Valley Skip Hire introducing an incinerator. This has already been refused by Calderdale MBC and then has also been refused by the planning inspectorate at appeal. We chose to live in Norland to bring up our children for the country setting and clean air. We do not want the air that we are breathing polluting with noxious fall out from the incinerator. We are trying as a nation to be carbon neutral and to create an environment of clean air. As part of my job I am now tied in with biodiversity net gain (BNG) and we are being asked to produce schemes that contribute to the environment giving a net gain of 10%, an incinerator and the obvious pollution this would create will have a negative effect on any good BNG is trying to achieve. It will have a huge impact on the wildlife both fauna and flora in our area, as well as the health of our children. If this incinerator is allowed it goes against all the environmental policies as a nation we are striving to achieve.

Please do not let this go ahead.

Regards

XXXXXX

81

Hello.

I would like to strongly object to the planning application made by Calderdale Skip Hire for an incinerator at Sowerby Bridge. The site is totally unsuitable and as a resident living above the proposed area I am totally opposed to the prospect of myself and my family breathing in the toxic air it would undoubtedly create. How many more times do the locals of this area have to go through this? Calderdale Council must throw this out and ensure it is never applied for again.

Regards

XXXXXX

Sent from my iPhone

82 We have lived in this valley for over XXXXX years ,with lovely views across the valley, the thought of having a incinerator in our beautiful valley fills us with dread.

The location of the incinerator in the very bottom with hills on both sides, the only place the smell and smoke can go is into sowerby bridge and ripponden.

A few years ago when they had the fire the fire engine was there for three days, the smell was horrendous, as it could not escape up the valley.

It beggars belief why we are still talking about it, when everybody knows this is the wrong place for it, how many time do they get to apply before we can call a halt to this ridiculous scheme.

We have schools and young families living in this valley, why would any of us want to buy a house in this area if they got plans to go ahead, those living here now would struggle to sell, prices would just plummet.

Come on Calderdale get your act together and just say no.

Dear Sir

We are writing to oppose the granting of an environmental permit to Calder Valley Skip Hire Ltd for the operation of a small waste incineration plant (SWIP) at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.

#### Site Location and Surrounding Environment

The proposed incinerator would be situated in a steep-sided valley, surrounded by trees and in extremely close proximity to densely populated residential areas, including three schools. The emissions from the incinerator would pose severe and unacceptable risks to the health and wellbeing of local residents, particularly vulnerable groups such as children and the elderly.

#### Previous Findings by the Government Planning Inspector

In the previous appeal decision, the government planning inspector unequivocally stated that the incinerator would be detrimental to human health. The current application shows a disregard for these critical findings and fails to address adequately the serious concerns raised by the inspector about the adverse health impacts on the local population.

#### Air Quality Concerns and Increased Traffic

The proposed incinerator site is located upwind of Sowerby Bridge, an area already designated as an Air Quality Management Area (AQMA) due to existing air pollution issues that exceed legal limits. Emissions from the incinerator would further exacerbate the poor air quality in the AQMA, endangering public health. The site's location in a valley would trap pollutants and prevent their dispersal, leading to dangerous concentrations of toxins in the air. Moreover, the incinerator would significantly increase heavy goods vehicle traffic, with the previous application stating 120 lorry journeys per day (60 in and 60 out). This additional traffic would contribute to congestion, noise pollution, and further deterioration of local air quality.

#### Inconsistency with Council's Stated Clean Air Goals and Tourism Strategy

Calderdale Council has publicly stated its commitment to improving air quality for all residents through its 'Let's Clear the Air' campaign and Air Quality Action Plan. The council has set goals to reduce air pollution and create a healthier



environment. However, permitting this incinerator would be in direct conflict with these stated clean air plans and emission reduction targets. It would undermine the council's credibility and efforts to protect the health of local communities from the harms of air pollution.

Furthermore, Sowerby Bridge and Halifax have experienced a surge in tourism over the last few years due to popular TV shows filmed in the area, such as Happy Valley, Last Tango in Halifax, and Gentleman Jack, as well as the rejuvenated Piece Hall hosting concerts by major artists. The incinerator runs counter to this thriving tourism industry and the council's efforts to promote a sustainable, tourism-based economy that benefits the entire community. The council should prioritise supporting local initiatives that capitalise on this tourism potential rather than allowing a polluting incinerator that would detract from the area's appeal and economic growth.

### Legal Duties and Obligations

The council has a legal obligation to apply the precautionary principle, which requires taking preventative action in the face of uncertainty and shifting the burden of proof to the proponents of an activity. The known risks associated with incinerator emissions necessitate refusing the permit.

Under the Public Sector Equality Duty, the council must consider the discriminatory impact of its decisions. This incinerator would disproportionately affect vulnerable groups, and the council must mitigate any inequality.

Permitting the incinerator could breach residents' right to life and health under the Human Rights Act 1998. The state has a positive obligation to protect citizens from environmental harms.

The council's commitment to clean air has created a legitimate expectation among residents. Granting the permit would frustrate this expectation and be grounds for legal challenge.

### Severe Environmental and Health Risks

Incinerators are known to emit highly toxic substances that accumulate in the environment, causing long-term damage to health and ecosystems. The precautionary principle must be applied to prevent these unacceptable threats.

### Alternative Sustainable Waste Management Solutions

The council should prioritise sustainable waste management methods rather than permitting polluting incineration in a densely populated steep sided valley. Incineration undermines recycling, releases greenhouse gases that contribute to climate change in the midst of a climate emergency, and perpetuates unsustainable waste disposal.

In conclusion, I strongly urge Calderdale Council to reject this permit application. The proposal is contrary to the planning inspector's findings, inconsistent with the council's clean air goals and tourism strategy, and poses severe risks to the environment and public health. The council has a legal duty to protect residents, support sustainable economic growth, and lead the transition to cleaner waste management.

I trust that the council will make the responsible decision to refuse the environmental permit, maintain its commitment to clean air, and foster a thriving, tourism-based economy for all.

Yours truly

XXXXX

84	<p>I write to object to the proposed plan for Calder valley skip hire's resubmission of the application to operate a waste incinerator 24 hours a day on Rochdale road in sowerby bridge.</p> <p>I am shocked that the council are asking council officers to decide the outcome !!!</p> <p>Not only is this a disaster for our environment but also for the health of the residents in this town.</p> <p>Yours outraged</p> <p>xxxxx</p>
85	<p>I object most strongly to the proposed Building of the Waste Incinerator</p> <p>Yours sincerely XXXXX</p>
86	<p>I live on XXXXX, above Calder Valley Skip Hire premises, and I strongly object to the waste incinerator plan.</p> <p>The incinerator waste fumes will all spread across the valley top, there's always a haze in the valley where they are situated. I think we would be somewhere near the top of the waste flue/ chimney, so it will discharge its waste all over the valley top, It will also drop into the valley bottom negative affecting all the small businesses running We also have three schools at the valley top and many many house, with lots of families and children, would you want your children breathing in all those fumes?</p> <p>The traffic is dreadful in Sowerby bridge, so what will it be like when all the wagons come through with their rubbish? It is bad enough now.</p> <p>Big wagons have already been seen pulling out the road leading from the Calder Valley Skip Hire Site, this is just a window of the future. Sowerby Bridge will no longer be a clean environment.</p> <p>Yours XXXXX</p>

87

Good morning,

I am writing to formally object to the application by Calder Valley Skip Hire for an environmental permit for schedule 13 Small Waste Incineration Plant on Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.

As a local resident I believe this application cannot be granted permission.

The close proximity to residential properties and schools in sowerby bridge makes any risk to the increase of pollutants in the valley absolutely unacceptable. Regardless of modelling.

If such an application is accepted I believe confidence in the local council will be totally lost. Especially from myself and friends, family and acquaintances, all of which are totally opposed to the application.

How can a local council, many of which must be residents of sowerby bridge, allow the incinerator plans to go ahead? It would show an utter disregard and disrespect for the opinion, health and wellbeing of the local community.

If the local council is meant to represent and care for the local community, how can you in good conscience allow such a risk to the health of local people?

Regards,

XXXXX

Lifelong resident of sowerby bridge

88

To whom this may concern,

I object to the sowerby bridge incinerator.

Kind regards,

XXXXX

89

Good Morning

I would like to lodge my objection to the incinerator application by calder valley skips in sowerby bridge.

They have had this built for a few years now.

Pollution in sowerby bridge is already high with the traffic congestion morning and evening. Having this incinerator running 24hrs aday will only add to the problem. Our roads are in bad need of repair so more waggons will add to the problem. As for air pollution we have various schools in the area which are in line of the chimney. Its is a residential area around too. My father lives close and has COPD so i am concerned for his health. What is going to be burnt in the incinerator? How will the air quality be monitored? There is a machine in sowerby bridge which doesnt work!!

The whole idea of having one in the valley is ridiculous. Something like this needs to on a hill and have a better road system to it.

How many times are these appeals and reapplying going to go on for?

Come on councillor's support your voters and refuse this incinerator in our valley.

Regards

XXXXX

90

Hi apologies i forgot to add my post code XXXXX

----- Forwarded message -----

From: XXXXX>

Date: Thu, 21 Mar 2024 at 11:44

Subject: Calder valley skip hire waste incinerator environmental permit application Belmont site Rochdale road

To: <community-safety@calderdale.gov.uk>

I would like to register my objection to this application on several grounds.

1.An independent government inspector has previously reviewed and inspected the site for 2 days. He found an almost identical application last year for a permit for this site.

It was published that he found that he was not satisfied that the gasses discharged from this site would be controlled in a safe way to protect human health and safety.

The environmental health officer or any other officer considering this application has a duty of care to consider this previous finding regarding health and safety are acted on.,in this subsequent application.

2.The data used for the weather is not based on any recent current data gathered from the valley, it is used via a computer modelling system based I believe on weather not in calderdale but in the general area of west yorkshire therefore the computer model used cannot be accurate for this area.

The weather in this valley is a microclimate created by the steep sided valley regarding health and safety are acted on.,ey any mist and fog stays in the valley bottom for long periods of time.This would surely affect dispersion of gasses at this site.

3. The level of pollution in the valley has not been measured constantly over a sustained period of time using the meters that are situated in the valley as no data is currently available from the meters .therefore the emissions levels in the valley are not being portrayed accurately enough .before any such permit is allowed comprehensive accurate readings need to to be measured to ensure the levels being published by the council officers and environmental health dept are correct.

It is the environmental health officer and the council officers duty of care to ensure that any meters placed to measure pollution in the area are recording or measuring constantly and correctly and that the data is available for public scrutiny.this is not the case for this valley.

4. In the previous application it was noted that CMBC may request copies of the site diary and site inspection records service reports analytical data reports this has been removed on this application. This limits the council's ability to ensure that the permit conditions are being followed.

91 Re Calderdale Planning S13/006 Calder Valley Skip Hire Incinerator Application

To whom it may concern:

With regards to Application S13/006 Calder Valley Skip Hire Incinerator, we wish to lodge our objection to the application for the following reasons.

- The site is located adjacent to domestic properties.
- The site is located in the valley bottom and therefore all exhaust fumes will be omitted at a similar level to the properties located on the opposite side of the road to the site.
- Increased Heavy Goods Vehicle Traffic through Sowerby Bridge and Ripponden both are already log jammed throughout the day
- Increased pollution within the valley both from the extra vehicular activity and exhaust gases from the incinerator plant
- The smell omitted from the incinerator plant, particularly on evenings when the air becomes “heavy” and lingers within the valley (Experience with the incinerator located at Allerton Park located near Harrogate) they do emit odours dependent on what is been processed..
- Increased noise for all local residents both vehicular and operational as the application is for a 24hr operation
- Access to and from the proposed site is difficult and on a slope, with HGV’s having to Rev engines to leave site.

Yours Faithfully

XXXXX

92 I would like to most strongly object to the calder valley skip hire in it's appliction for an incinerator on rochdale road sowerby bridge  
and fully support the planning inspector john woolcock report of the 5th july 2023 .  
Breathin clean air should be a basic right of the community in the surrounding area  
XXXXX



93

Dear Sir/Madam

Objection to the incinerator

I am sending this email feeling both anger and dismay that the incinerator at CVM is even being considered in such a built up area. This will finish the towns of Ripponden and Sowerby Bridge off completely, by creating poisonous smog, causing health hazards and closing businesses still reeling after the pandemic. I am a business owner in the town of Sowerby Bridge and I strongly object to this going in as I will be forced to leave the area.

Yours faithfully  
XXXXX

94

Dear Sir/Madam

Objection to the incinerator again

I am sending this email feeling both anger and dismay that the incinerator at CVM is even being considered in such a built up area. This will finish the towns of Ripponden and Sowerby Bridge off completely, by creating poisonous smog, causing health hazards and closing businesses still reeling after the pandemic.

I have lost count of the number of times I have emailed objecting to the incinerator. Why can't they just be told No and let that be an end to it. Sowerby Bridge and the surrounding areas have some really beautiful countryside and nobody wants that polluting in anyway. Please let this email be the last I have to write objecting to this very much unwanted incinerator.

Yours faithfully  
XXXXX

95

To whom it may concern,

I find it difficult to believe that after 8 years this motion is still on the table.

I will not go into too much detail as the many reasons why this is a ludicrous idea have been noted many times.

However there is no reason to assume that the problems mentioned multiple times have been removed.

Pollution from the incinerator itself (close to schools, green spaces and homes). Pollution from more HGVs pumping out diesel fumes and tire rubber. Traffic congestion from the same HGVs. Prior controls and actions by the company concerned. Regular flooding on the site pushing detritus down the valley.

The list goes on.

Please use a bit of common sense and think of your constituents, not a millionaire who just wants to make more money.

Regards

XXXXX

96

Ref S13/006

I wish to strongly object to Calder Vally Skip Hire's planning application for a waste incinerator.

This has been refused before and is becoming a serious drain on valuable council resources and funds.

It must be stopped on once and for all now.

I am a resident of Calderdale, my address is below

XXXXX

97

Good day

Plenty good reasons to STOP this application and any other applications put forward in the future for the incinerator plant to go ahead in our valley or any other valley.

NO NO NO NO NO This has to Stop immediately.

This application will create Pollution in a massive scale NOT ACCEPTABLE.

We are already breathing high level of toxic fumes from the road traffic volume which has tripled over the last 25/30 years.

The road conditions are in an appalling state and with more heavy good vehicles using these roads they will be causing even more damage and more congestion in the valley.

To give these people the permit to operate is utterly pure MADNESS and should not even be on the table for discussion its ABSOLUTELY NUTS.

This is a high residential area of Calderdale.

There are 10 schools in the valley from Rishworth to Copley not including the ones in Brighouse and our other surrounding area of Calderdale.

The flue for extracting the fumes can never be high enough in a valley of any kind let alone our valley it would need to be 1000 feet tall not possible.

The Poisoning toxic fumes would also be killing us humans by clogging up our lung's, kidneys, blood vessels and creating heart problems and breathing issue's for many if not all for years.!!

The toxic fumes will hover in the valley killing all the wildlife everything from your little insects to our fantastic birds, deers, stouts, weasel's, squirrels, and fish that are in our woodland, rivers and streams.

The site upon which Calder valley skips as being built, without planning permission i might add is a flood plain.

This means they have no flood defence in place to prevent the site from flooding washing all their toxic unwanted waste into the rivers, streams and woodland as far down as the rivers flow.

You only have to look on a foggy day how the fog or smoke sits and hovers in the valley.

As residents in the valley we are not allowed to burn treated wood or normal coal it has to be smokeless so what gives them the right to burn what the flipping eche they want??

There will be nobody to monitor the amount of waste or what they burn and even if there was they would fiddle the info. So the answer to incinerator is NO NO NO NO NO NO.

Regards XXXXX

98 I am writing to object to the above proposal.

Why the proposer is allowed to keep resubmitting the application with minor tweaks is a disgrace. They are obviously set to gain financially so they are happy to take the risk.

While we, the community have to raise money to employ solicitors to keep fighting.

This proposal should be declined permanently on public health grounds.

Existing pollutants are already trapped by the valley sides. Any increase to these will have a huge impact on the health of the community.

Sowerby bridge is already in an Air Quality management area so again, to consider adding to pollutants is abhorrent and immoral.

The use of computer simulation which doesn't use local weather data is nonsensical.

The fact that the new proposal has taken out the option for the council to request inspection records at any time, shows that the proposer does not intend to operate with openness and clarity within the guidelines set.

In addition, it will cause house prices to decrease and send the area into even further decline.

Regards

XXXXX

99	<p>To whom it may concern, I wish to register my objection in the strongest possible terms to the proposed incinerator in Sowerby Bridge. Its proposed position is utterly unsuitable and the track record of the company proposing the incinerator proves their unsuitability to run such a facility.</p> <p>I will be sending another email to register my mum's objection.</p> <p>Regards XXXXX</p>
100	<p>To whom it may concern, I wish to register my objection in the strongest possible terms to the proposed incinerator in Sowerby Bridge. Its proposed position is utterly unsuitable and the track record of the company proposing the incinerator proves their unsuitability to run such a facility.</p> <p>This email is to register XXXXX's objection.</p> <p>Regards XXXXX</p>
101	<p>I would like to register my objection as a resident of sowerby bridge regarding the application for a waste incinerator on Rochdale road in sowerby bridge.</p> <p>Regards XXXXX Sent from my iPhone</p>

Dear Sirs,

One has to wonder what the real driver is behind CVSH's persistence with a declined Application, declined Appeal and them covering the expense on pursuing it further. How many local residents have actually shown support for the Application and subsequent Appeal, to date? Certainly, all local Councillors across different parties, two local MPs and many residents have opposed from the beginning. CVSH's previous disregard of restrictions required on their operation of the current level of recycling at that plant, coupled with that ready investment in further Application/Appeal expense, does not suggest that their fervour can be purely a desire to provide a public service.

The fairly steep-sided valley, into which the recycling plant has imposed, contains the A58 trunk road which is a major link for traffic to and from the M62. At peak hours, school times and during motorway closures the traffic queues through Sowerby Bridge in both directions and often out past the CVSH site. Therefore, Sowerby Bridge already has a pollution issue that its geography induces. An incinerator plant running 24/7 Mon-Fri in that locale will be significantly exacerbating that issue. During COVID lockdowns, traffic and recycling plant non-existent, it didn't need any scientific instruments to confirm a vast improvement in air quality!

I understand that CVSH are using an ADSM model to argue the point regarding waste gasses flow. While computer model tools may have simulation options that can be selected during the mapping, these will be global theoretical elements rather than based on factual data taken from the specific environment of the Ryburn valley. As a result, these models can only be a 'possible' not a 'conclusive' picture of emissions dissipation. Until location-specific data is available and input to the tool, you might as well stick a wet finger in the air.

On 1 March 2024 I noticed someone's smoky bonfire in the bottom of the Ryburn valley. I made use of a window that overlooked it to record a video of just how 'fast' (pardon the sarcasm) any emissions from a furnace would probably take to dissipate. You will need to watch for a while to note the almost imperceptible movement of the smoke, staying low in the valley and moving in a Sowerby Bridge town centre direction. The sound of the house's tv in the background (and the mic picking up steady breathing) should confirm it is real time not artificially slowed. I am sure that most of the opposition to the Application are well aware of this likelihood already but still submit the video in support. Because of the file size of the 1.19min video, I have given a OneDrive cloud storage link to it. You may possibly need to download a copy for it to run smoothly on your device.

20240301\_173239.mp4 [Ctrl+click]

We might have to continue to bear the regular loud skip bashes and metallic scaping-across-the-yard-floor type noises from the site going forward. That is still a pollution but not one directly affecting lungs, especially of those who suffer from asthma. Incinerator waste gasses hanging in the air 24/7 certainly will! My recent video and many other objector's footage surely cannot be ignored and are real, not an estimate from a computer model.

Please count my vote on CVSH's re-application, with its' suspicious modifications (and omissions like ability of CMBC to inspect SWIP operational records ?) , as **FIRMLY AGAINST ANY PERMISSION FOR AN INCINERATOR** in the inappropriate location of the Ryburn Valley.

Thanks

XXXXX

103 Good Morning

I am a resident in Sowerby Bridge and I would like to make my opinion for the above noted.  
I am 100% against this proposal as I fear the Health and Safety of residents within the area will be at risk because of the air pollution.

Regards

XXXXX

104 Dear Sir or Madam,

I would like to object to the above application for an Environmental Permit to operate a waste incinerator in Sowerby Bridge.

This issue was settled (or so we believed) on 5 July 2023 when the government inspector ruled against it.

All the issues raised by the inspector then still apply today. I am at a loss to understand how it could be possible for an application deemed to be unacceptable last year could be considered acceptable today.

In addition, the original application offered the council the ability to view the site diary and and inspection records on demand. This is omitted from the new application, thereby significantly reducing council oversight.

The proposed site is still unsuitable for this operation, as the inspector ruled last year. It represents a serious threat to air quality in an area already suffering from air pollution.  
This in turn threatens the wellbeing of local residents.

The application should be refused.

XXXXX



105

Dear Sir/Madam

I am writing to wholeheartedly object to the above application (S13/006) by Calder Valley Skip Hire (CVSH) for an Environmental Permit to operate a waste incinerator at their site on Rochdale Road, Sowerby Bridge.

This application is a resubmission of a previous application which was refused in July 2023 by John Woodcock, Government Planning Inspector. The reasons for the consistent refusal of CVSH applications over the last eight years are still well founded and valid. The huge number of public objections received by Calderdale Council over this period are also still well founded and valid. Granting CSVH an Environmental Permit to burn 10,000 tons of waste a year for 24 hours a day, five days a week would add hugely to the air pollution issues Sowerby Bridge already has to contend with.

It is also extremely worrying that this new application significantly removes Calderdale Council's ability to monitor compliance in the operation of aforesaid incinerator should a permit be granted to CVSH.

Sowerby Bridge is in an Air Quality Management Area - we definitely do not need any further unnecessary contribution to air pollution levels - we should be striving to cut down the levels of air pollution and certainly not further adding to them. This incinerator would, undoubtedly, significantly impact our air quality, as reported by the Government Planning Inspector in 2023 - nothing has changed - the permit was refused in July 2023 for these reason and it should be refused again now.

We need to safeguard our health and environment - breathing clean air should be a basic right of any community and to that end, I am asking Calderdale Council to do the right thing and refuse this application on the same grounds as it was refused in July 2023.

Yours faithfully

XXXXX

Dear Sir/Madam,

I once again wish to state my opposition to the proposed incinerator at the Belmont recycling centre in Sowerby Bridge. It must be perfectly obvious that the incinerator would vastly impair the air quality in the area. Not only would there be pollution from the incinerator itself but there would be a sizeable impact from the wagons arriving and leaving the site, which in itself would create noise pollution for nearby homes and add to the already congested route through the town. The owner of CVSH repeatedly states that the gases will disperse safely despite the fact that the proposed site is placed towards the bottom of the valley and the prevailing wind direction will blow all the emissions back towards the town. This could have serious repercussion for the health of all the residents, especially those with lung conditions such as asthma. There would also be an impact on local schools with parents being unwilling to let their children play outside at lunchtime or take part in sporting activities due to the risks. The employees at the nearby industrial estate and other local businesses will also be concerned, particularly those who work outside, leading to businesses potentially relocation elsewhere and reducing footfall in the town centre.

The area could also see problems in terms of people wishing to live there in the event of the incinerator being granted planning permission. Families might well be deterred from moving to the area, those already living in the area may well wish to leave but face problems selling their houses for anything like the market value.

However you look at this proposed development the consequences for the health and prosperity of the area will be devastating.

Yours faithfully

XXXXX

107 To Whom It May Concern,

Once again I want to register my objections to Calder Valley Skip Hire's Application for an Environmental Permit to operate a waste incinerator in Sowerby Bridge.

Having already failed to convince the Government Inspector to issue a permit because there was insufficient evidence that there would be no risk to the air quality and the safety of the operation, now with no further amendments and safeguarding procedures CVSH is applying again.

I live on the XXXXX in XXXXX, overlooking the site, which is often obscured by mist, which hangs in the valley bottom, held by steep sided hills. The plume from the incinerator would only add to any mist, hanging in the air over the site before heading down the valley towards the town centre and the rest of the Calder Valley, in the prevailing wind.

According to the Government website, the incinerator site is on a flood plain:

"The area around Calder Valley Skip Hire Ltd, Sowerby Bridge, HX6 3LL has a:

high risk of surface water flooding;

medium risk of flooding from rivers."

The site has a wall next to the river, but this is breached on site to allow surface water flooding to escape the site and flows into the river Ryburn. What happens if the incinerator building is flooded and the flood water enters the river, before then continuing down stream to join the Calder, which is already one of the most polluted rivers in the country?

There are hundreds of houses on the valley sides, around the CVSH site, along with several schools all with playgrounds and Playing fields, will the children be safe playing out or playing games?

There are no automatic weather stations in the vicinity, only a manual one, in Copley. Who can tell where, when and how much pollution, or otherwise, is being produced and where it will go? Who will monitor the operation of the site, any pollution or discharges, air quality and what is actually being incinerated? Can CVSH be trusted since they seem to disregard everything that has gone before? Why has CVSH been allowed planning permission and then applied for an

Environmental Permit when both should be considered together. How can Councillors be allowed to abdicate their duty and hand such an important decision to one individual, rather than the Democratically Elected Members in full Council?

I look forward to an early response.

Yours faithfully,

XXXXX

108 To Whom It May Concern,

Once again I want to register my objections to Calder Valley Skip Hire's Application for an Environmental Permit to operate a waste incinerator in Sowerby Bridge.

Having already failed to convince the Government Inspector to issue a permit because there was insufficient evidence that there would be no risk to the air quality and the safety of the operation, now with no further amendments and safeguarding procedures CVSH is applying again.

I live on the Norland hillside in East Longley, overlooking the site, which is often obscured by mist, which hangs in the valley bottom, held by steep sided hills. The plume from the incinerator would only add to any mist, hanging in the air over the site before heading down the valley towards the town centre and the rest of the Calder Valley, in the prevailing wind.

According to the Government website, the incinerator site is on a flood plain:

"The area around Calder Valley Skip Hire Ltd, Sowerby Bridge, HX6 3LL has a: high risk of surface water flooding; medium risk of flooding from rivers."

The site has a wall next to the river, but this is breached on site to allow surface water flooding to escape the site and flows into the river Ryburn. What happens if the incinerator building is flooded and the flood water enters the river, before then continuing down stream to join the Calder, which is already one of the most polluted rivers in the country?

There are hundreds of houses on the valley sides, around the CVSH site, along with several schools all with playgrounds and Playing fields, will the children be safe playing out or playing games?

There are no automatic weather stations in the vicinity, only a manual one, in Copley. Who can tell where, when and how much pollution, or otherwise, is being produced and where it will go? Who will monitor the operation of the site, any pollution or discharges, air quality and what is actually being incinerated? Can CVSH be trusted since they seem to disregard everything that has gone before? Why has CVSH been allowed planning permission and then applied for an Environmental Permit when both should be considered together. How can Councillors be allowed to abdicate their duty and hand such an important decision to one individual, rather than the Democratically Elected Members in full Council?

Yours faithfully,

XXXXX

109	<p>Please find attached my objection to the application for an environmental permit to operate a waste incinerator plant at the Belmont Site in Sowerby Bridge.</p> <p>Kind regards</p> <p>XXXXX</p>
110	<p>To whom it may concern, I'm once again writing to object to allowing Calder valley skip hire a permit to run an incinerator, my reasons are we have too much traffic running through Sowerby Bridge as it is especially bad when the M62 has an issue, another reason the skip hire is close by houses mostly older people most have breathing problems already without added fumes or smoke, there's also businesses close by, none are going to want added noise or smells drifting onto their place of work (one is a cafe). Also there is the river &amp; wildlife to consider, there's no saying what effects it will have on them. There are schools also close by, children need clean air to breathe not fumes or smells from lorry's carting who knows what. They need to find somewhere else to put it not in a valley, not near environment &amp; not near people. Please also consider we have been saying no to this for almost 8 years, the people of Sowerby Bridge don't want this. Please don't allow this to continue, we don't want it. The company don't appear to care about the people of the valley's opinions &amp; they should as we would have to live with it &amp; so would our children.</p> <p>Please don't allow this to happen. The environment needs to be kept clean &amp; safe from fumes &amp; pollution.</p> <p>Many thanks</p> <p>XXXXX</p>

111 To whom it may concern,

It beggars belief that you have allowed this farce to carry on so long, 8 years on this motion is still on the table.  
I strongly believe that underhand dealings going on between the applicant and some council employees or higher up politicians have allowed this to go on so long, in the hope that he can get his way!  
**DO NOT ALLOW THIS TO CARRY ON ANY LONGER!!!**

The basis of my objections are numerous:

The height and proximity of the smoke stack to trees and homes on the hill spewing out potentially toxic fumes into a confluence of 2 valleys where it is obvious on a misty day that the inversion is a huge factor!

Pollution from the incinerator itself (close to schools, green spaces and homes) in an area already classified as an Air Quality Management Area.

Pollution from more HGVs pumping out diesel fumes and tire rubber particulates and potentially bad smells from the rubbish being transported.

Increased traffic congestion in an already traffic heavy area (have you tried driving through Sowerby Bridge at peak hours or when there is a problem on the M62?)

Prior incidents of negligence and lack of controls and actions by the company concerned.

Regular flooding on the site pushing detritus down the valley.

The ADMS model used for their application did not use local weather data so cannot accurately predict what the effects will be on our unique microclimate.

The removal of the Council oversight to monitor compliance by the operator of the incinerator.

Please do the right thing at last and think of your constituents, not a millionaire who just wants to make more money and does not even live in the valley!!!!!!

Do not grant the Environmental Permit to this venture!

Regards  
XXXXX



112 Hi,

I would like to object to the proposition of the Calderdale skip hire incinerator. As a local resident living only a short distance from the site and having two children who both attend the local primary school, I have serious concerns for my family's health if it were to go ahead.

The pollution and poor air quality this would cause, should it go ahead, would have a catastrophic effect on our environment, both the wildlife and the woodland areas and more importantly peoples health and I'm unsure how this is even allowed to be considered given the number of people living close by and the already high emissions in near by Sowerby Bridge.

Our children deserve to be breathing fresh air whilst they play in their gardens, in their village and at school!

I would ask also if it could be explained as to why an application is still allowed to go ahead after being denied by officials numerous times already? Local councillors and political parties as well as residents have been opposed to the application from the start. I question whether money is being prioritised over our health and our environment.

Yours sincerely,  
XXXXX

113 To whom it may concern

I would like to register my strong objection to the proposed new incinerator plant for Calder Valley Skip Hire. The pollution within the valley is already poor due to the constant log jam of traffic through the high street and the addition of more gaseous pollutants is not acceptable.

The topography of the area is not conducive to the free movement of the pollution away from residential areas. One only has to look at how the fog settles in the valley to realise that on many days of the year when wind conditions are light, the chimney waste will not leave the valley.

I understand that waste must be processed and disposed of and this is not just a case of being a NIMBY (not in my back yard). This is just the wrong location for an incinerator and I for one would be happier to pay more for my skips so that they can be transported to a more suitable location where the treatment process does not have such an impact on the health and wellbeing of the surrounding population.

Once again, I object to this planning proposal in the strongest possible manner.

Thank you for your time in reading this.

Kind regards

XXXXX

114 Notice of Application

This is for an Environmental Permit for Schedule 13 Small Waste Incineration Plant:

Reference: S13/006.

Address: Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.

I am confirming my disapproval of the above permit and that it should not be granted. With our worldwide commitment to reducing pollution I find it ludicrous to situate such an incinerator in an already over polluted valley. We need to detract heavy traffic like this and not encourage higher pollution levels in the valley, we're thousands of family's and residents

already have and will be affected for years to come.  
XXXXX

- 115 I'd like to object to the proposal by Calderdale Skip Hire to build an incinerator in Sowerby Bridge on Rochdale Rd. I understand that John Woolcock, govt planning inspector, previously voiced his concerns in his report. I share concerns voiced by him regarding the particular lay of the land on Sowerby Bridge and pre-existing pollution issues.

There have been high profile cases in the news in recent years regarding the high risk to the health and safety of residents that air pollution causes, ultimately leading to death in some cases. Notably, children and other vulnerable residents with breathing difficulties and/ or asthma may be placed at particular risk by agreeing to have an incinerator in the area which will likely add to poor air quality in an area already of concern. The traffic problem along the road between Ripponden and Sowerby Bridge us concern enough in terms of air quality, without making matters worse.

I trust that the right decision will be made and that planning permission for the proposed incinerator will be refused.

Best wishes  
XXXXX

116

Dear Sir/Madam

I am writing to wholeheartedly object to the above application (S13/006) by Calder Valley Skip Hire (CVSH) for an Environmental Permit to operate a waste incinerator at their site on Rochdale Road, Sowerby Bridge.

This application is a resubmission of a previous application which was refused in July 2023 by John Woodcock, Government Planning Inspector. The reasons for the consistent refusal of CVSH applications over the last eight years are still well founded and valid. The huge number of public objections received by Calderdale Council over this period are also still well founded and valid. Granting CSVH an Environmental Permit to burn 10,000 tons of waste a year for 24 hours a day, five days a week would add hugely to the air pollution issues Sowerby Bridge already has to contend with.

It is also extremely worrying that this new application significantly removes Calderdale Council's ability to monitor compliance in the operation of aforesaid incinerator should a permit be granted to CVSH.

Sowerby Bridge is in an Air Quality Management Area - we definitely do not need any further unnecessary contribution to air pollution levels - we should be striving to cut down the levels of air pollution and certainly not further adding to them. This incinerator would, undoubtedly, significantly impact our air quality, as reported by the Government Planning Inspector in 2023 - nothing has changed - the permit was refused in July 2023 for these reason and it should be refused again now.

We need to safeguard our health and environment - breathing clean air should be a basic right of any community and to that end, I am asking Calderdale Council to do the right thing and refuse this application on the same grounds as it was refused in July 2023.

Yours faithfully

XXXXX

117 To whom it concerns,

Once again I must protest against this fresh application for a waste incinerator to burn skip rubbish so close to domestic abodes in Sowerby Bridge. The reasons for the case's rejection before have not been superceded by convincing evidence concerning our clean air. The dangers posed by toxic chemicals like dioxins to human health, not least to pregnant women, have been well documented in countries like the US. What will it take to get this issue closed once and for all short of an incineration method that will not poison our air or unleash untold carbon? The desire to incinerate waste epitomises our unsustainable throw-away culture at its worst. No more!

Sincerely,  
XXXXX

118 Good morning,

I am emailing to express my objection to the environmental permit application that has been made by Calder Valley Skip Hire.

It is clear from the location of the site in the bottom of a steep valley that the waste gases could not disperse without any impact to residents around it. I live in Norland on the hillside that overlooks the site and there is no way the company can 100% guarantee there will not be any adverse effects to the quality of the air we breath.

Sowerby Bridge already suffers from air pollution. Mist regularly lies in the valley bottom and will clearly stop waste gases dispersing.

Please protect us residents that would have the effects and impacts of the waste gases by refusing this application.

Regards

XXXXX

119 I am writing to you to register my objection to the permit application by Calder Valley Skip Hire.  
If this application is successful it will be a disgrace and proof of the cavalier attitude towards the health of the people of

Sowerby Bridge and its environs.  
XXXXX

120 Dear Calderdale Planning

I am writing to formally object to the introduction of a waste incinerator at Calder Valley Skip Hire in Rochdale Road, Sowerby Bridge.

My husband and I live at XXXXX which is extremely close to the proposed site of the incinerator. My husband suffers from asthma and the incinerator will pollute the air, resulting in either his death or us having to move.

This is an area of outstanding natural beauty which will be devastated by the smoke and fumes generated from continually burning rubbish, this is totally unacceptable.

I suggest the owner sites it next to his house in the Cotswolds!

Thanks

XXXXX

121	<p>Dear Sirs,</p> <p>We are writing to lodge our total objection to the proposed Waste Incinerator on Rochdale Road in Sowerby Bridge.</p> <p>Our major concern is with regard to the pollution that the smoke emissions will cause and the subsequent damage to the air quality that humans, creatures and nature will have to suffer. This can only have a negative effect on everyone's health and wellbeing. Having lived in the valley for over 40 years we know without a doubt that regularly the air hangs in the valley and does not disperse until a breeze picks up.</p> <p>The 24 hour operation, 5 days a week, is not what we would term a small incinerator. Pollution, both air and noise, will also be increased massively by all the vehicles bringing the waste to the plant.</p> <p>We sincerely hope that the Environmental Permit will be refused, as it was before, as it would be a complete disaster for this valley and surrounding area if it was granted.</p> <p>Yours faithfully</p> <p>XXXXX Residents</p>
122	<p>I strongly object to the Incinerator: Breathing clean air, is a basic right of any community. XXXXX</p>

123 With reference to the current application to operate a waste incinerator on Rochdale Road Sowerby Bridge, I would like to register my objections on the following grounds.

The application would appear to be a resubmission of the 2020 application subsequently refused at appeal in July 2023 by a Government Planning Inspector. This further application has to be an abuse of process and certainly runs counter to the spirit of last year's appeal.

The height and proximity of the smoke stack to trees, woodland and Sowerby Bridge itself in a steep valley bottom would be injurious to both people and the environment. The ADMS computer model which seeks to suggest otherwise is based on data obtained from Leeds Bradford Airport, a completely different and differing location.

Sowerby Bridge is already suffering from pollution to the effect that it is an Air Quality Management Area. Smoke and mist regularly lie in the valley bottom and inversion can stop the effective dispersion of waste gases. This throws considerable doubt on the validity of the models presented by Calder Valley Skip Hire.

Unlike the original application there is no mention of the ability of Calderdale Council to request copies of the site diary and inspection records. This significantly removes their ability to monitor compliance in the operation of the incinerator.

All local MPs and Councillors have opposed this application from the beginning in addition to which there is strong opposition from within the community. It is worrying that cabinet, by refusing to vote on the matter, are trying to remain neutral on a matter which they should be taking up on behalf of the community they are there to serve.

XXXXX

124 I am contacting you to oppose the operation of an incinerator by Calder valley skip hire on Rochdale road Sowerby bridge.

Previously an application was denied on environmental grounds, and now the company have reapplied either a largely similar plan. It is doubtful if given permission that this company would manage the site properly, and the geographic situation in a deep narrow valley would mean emissions would not exit the valley, which Sowerby Bridge is in. This is not a safe site. A previous large fire there shows corners would be cut-

XXXXX

Sent from my iPhone



125 I strongly object to this planning application going ahead on the grounds that CMBC found in the 2020 planning application by said company that there was not sufficient evidence to support that safe, complete burn, with no hazardous gases being expelled would be possible without detrimental effects to air quality.

What is going on at CMBC? How can you want to go backwards? Incineration is never a good choice, causes air pollution promotes unsustainable practises, etc. You have an environmental sustainability dept, please stop green washing and do the right thing and withdraw support for this application, Reject it for good.

XXXXX

Sent from Mail for Windows

126 Dear Sirs

I wish to voice my concerns about Calder Valley Skip Hire Re applying for an Environmental Permit to burn waste in the Ryburn Valley.

This would be a huge health hazard to people in the valley and for people like myself up XXXXX.

I do not understand why you have ignored the governments planning inspector John Woolcock statement that....  
" HE WAS UNABLE TO FIND THAT WASTE GASES FROM THE INCINERATOR WOULD BE DISCHARGED IN A CONTROLLED WAY AS TO SAFEGUARD HUMAN HEALTH AND THE ENVIRONMENT"

I am one of the Humans who happen to live on the hills of this valley and do not want to breath in the pollution that this incinerator will cause. Who in thier right mind would ever think that burning waste would be a good idea at the bottom of a valley. If the Smoke and mist is not lying in the bottom it will be drifting up to the surrounding hills Norland and polluting the air that we breath.

Please do not let this go ahead for the health of the people of Norland and the surrounding area.

Regards

XXXXX

127 Dear Sirs,

I wish to voice my concerns about Calder Valley Skip Hire Re applying for an Environmental Permit to burn waste in the Ryburn Valley.

This would be a huge health hazard to people in the valley and for people like myself up in the hillside of Norland.

I do not understand why you have ignored the governments planning inspector John Woolcock statement.

" HE WAS UNABLE TO FIND THAT WASTE GASES FROM THE INCINERATOR WOULD BE DISCHARGED IN A CONTROLLED WAY AS TO SAFEGUARD HUMAN HEALTH AND THE ENVIRONMENT"

I live on the hills of this valley and do not want to breath in the pollution that this incinerator will cause.

Who would think that burning waste would be a good idea at the bottom of a valley.

If the Smoke and mist is not lying in the bottom it will be drifting up to the surrounding hills of Norland and polluting the air that we breath.

Please do not let this go ahead for the health of the people of Norland and the surrounding area.

Regards, XXXXX

128

I wish to lodge my objections to the planning application proposing to place an incinerator in Sowerby Bridge. The basis of my objection to this application is grounded on community health and safety.

1. Adding more traffic to an already well trafficked location will decrease health and safety for all.
2. Further impeding progress to current and future road users safety.
3. Increase pollution from the vehicles that travel on this route who are delayed by incinerator business traffic.
4. This is close to a canal path and river with country and nature walks used by local residents, visitors to the area, families and their pets as well as local wildlife. The facility proposed will create noxious fumes and other waste. The site is in proximity to our Health centres and sports center!
5. The negative effects of this pollution (from the industrial process involved by incineration) on the commercial interests already in situ in Sowerby Bridge and the health of residents and workers and visitors to Sowerby Bridge.
6. The topography of the terrain being non conducive to the efficient dispersal of gases and fumes from the incineration proposed location.
7. Sowerby Bridge, as a major motorway throughfare, has a high proportion of people in poverty and health issues, many with lung and heart conditions as a result of living beside the highways, and who do not need a further source of noxious gases and fumes.
8. There may be fumes and substances which affect the flora and fauna, wild plants, animals and the many trees in the area . Environmentally an incinerator and refuse business is unwelcome and not conducive to nature thriving.

What substances and by-products from the incineration, storage and industrial processes will leach, or be disposed into the soils, air and waterways around the site?

I request that the proposal for planning permission for a refuse processing site with incinerator in Sowerby bridge be declined.

XXXXX

129

I wish to object to the planning application to operate a waste incinerator on Rochdale Road, Sowerby Bridge by Calder Valley Skip Hire.

I understand this is a resubmission after being refused at appeal in July 2023 by the Government Planning Inspector.

I am a local resident and am seriously concerned about the emissions in this low valley area location, there are many houses close by and also many Infant and Junior Schools which could affect the childrens health.

I would be grateful if my objections could be recorded and advised on the way forward.

Yours Sincerely

XXXXX

130 Please register my objection to the granting of an Environmental Permit for a waste incinerator on Rochdale Road in Sowerby Bridge on several grounds & confirm that my objection has been noted.

I cannot understand why another application has been allowed, when the previous applications were refused. At an appeal in July 2023 the Government Planning Inspector stated he was 'unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment'. This refusal should have put an end to this.

The site on Rochdale Road in Sowerby Bridge is simply the wrong location for a waste incinerator, because emissions will be held in the valley where they will affect the health of residents in Sowerby Bridge due to this and the prevailing wind. I do not feel confident that Calderdale Council will consider all the evidence against this application, they are refusing to vote on this matter, instead asking Council Officers to decide.

I understand the new application has used weather data from a location at Leeds Bradford Airport as supporting evidence. This data is not valid, the location has no similarity to the proposed incinerator location in Sowerby Bridge. At the very least there should be data independently gathered from the proposed location.

I live a short distance from the proposed site. I have seen several fires on the site and numerous days of bad odour from the site due to poor waste management. Along with many residents in Sowerby Bridge, I have opposed this application for many years. The refusal in 2023 should have been the end of the matter, but by applying for a permit again the applicant is hoping persistence will pay and this will slip through the system and get approved.

Calderdale Council should cancel this application because it is a resubmission of the 2020 application which was refused.

Calderdale Council must reject this application and ensure no further applications are considered because the 2023 refusal was final.

Please confirm that my objection has been noted.

Kind Regards,

XXXXX

131 I would like to register my objection to CVSH application to build an incinerator in Sowerby Bridge.

I find it absolutely ludicrous that such an application is even being considered after already being refused and in an area already under Air Quality Management.

The air quality is already compromised in the area and this incinerator would only make matters worse not to mention would be a danger to local wildlife and residents given they have no way of being able to control let alone monitor the waste gases dispersal.

XXXXX

132 I wish to state my objection to the application for an Incinerator in Sowerby Bridge by Calder Valley Skip Hire.

There is already enough pollution & devastation of the valley.

Regards

XXXXX



133

Hello,

I hope you are well.

As a resident of Sowerby Bridge and within 1 mile of the proposed small waste incinerator plant, I am writing to object to the Sowerby Bridge Small Waste Incinerator.

There are many reasons for my objection, which are listed below:

- Myself, family, neighbours and local community will be exposed to toxic pollutants which can harm our health. Dioxin impacts your immune system and, in some cases, can even cause cancer. Hazardous ash can cause both short-term effects (such as nausea and vomiting) to long-term effects (like kidney damage and cancer). Greenhouse gas emissions from incinerators and other sources can contribute to respiratory diseases.
- Due to increasing quantities of waste sent to incineration, incinerators will emit more toxins and pollutants which will harm local air quality.

In addition, it is known that sowerby bridge is already suffering from air pollution.

It seems common sense not to build an incinerator in a built up residential area and completely irresponsible to residents.

I look forward to hearing from you.

Best wishes,  
XXXXX

134

Hello,

I hope you are well.

As a resident of Sowerby Bridge and within 1 mile of the proposed small waste incinerator plant, I am writing to object to the Sowerby Bridge Small Waste Incinerator.

There are many reasons for my objection, which are listed below:

- Myself, family, neighbours and local community will be exposed to toxic pollutants which can harm our health. Dioxin impacts your immune system and, in some cases, can even cause cancer. Hazardous ash can cause both short-term effects (such as nausea and vomiting) to long-term effects (like kidney damage and cancer). Greenhouse gas emissions from incinerators and other sources can contribute to respiratory diseases.
- Due to increasing quantities of waste sent to incineration, incinerators will emit more toxins and pollutants which will harm local air quality.

In addition, it is known that sowerby bridge is already suffering from air pollution.

It seems common sense not to build an incinerator in a built up residential area and completely irresponsible to residents.

Best wishes,  
XXXXX

I look forward to hearing from you. Sent from my iPhone

135

Dear Sir/Madam

I am strongly AGAINST the proposal from Calderdale Skip Hire for a waste incinerator on Rochdale Road in Sowerby Bridge.

I certainly do not want to breath in waste products. We already have enough pollution in this area. I thought the world was looking towards a cleaner earth.

Please put my objection forward.

Kind regards  
XXXXX

136

Dear Sir / Madam,

I am writing to convey my support for local resident objections to the SB incinerator. I have sent objections previously but am truly disappointed to hear that Calder Valley Skip Hire has once again resubmitted their request.

There are many concerns surrounding this proposal, including the impact on village air quality for all of us, but most concerning for our young children and vulnerable. There also appears to be many inconsistencies in the proposal with a lot of grey area on how the site would be monitored and its impact measured.

I love my community and stand with local councillors and local MPs who have opposed this application from the beginning. Breathing clean air should be a basic right of any community.

My details are:  
XXXXX

Best wishes,  
XXXXX

Sent from my iPhone

137 Environmental Permitting (England and Wales) Regulations 2016 ("the Regulations")

Application for environmental permit for Schedule 13 small waste incineration plant ref S13/006

Calder Valley Skip Hire, Belmont Industrial Estate, Rochdale Road, Sowerby Bridge HX6 3LL

The above application should be refused because this has been rejected once and there have been no changes made by Calder Valley Skip Hire to protect the health of people or the environment. Last time the inspector was unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment. Nothing has changed. Also, the noise would be detrimental to the health and mental wellbeing of local residents of which I am one.

The permit to use the incinerator should be refused.

XXXXX

138 Please note my objection to the below application

Reference: S13/006.

Address: Belmont Industrial Estate, Rochdale Road, Sowerby Bridge

The proposed incinerator will impact on the health of the local community and will also have a negative impact environmentally, with the residue from the waste incinerator lying in the valley bottom. Breathing clean air is a basic human right for all.

XXXXX

Sent from my iPhone

139	<p>I am writing to you too again object to the application for a waste incinerator in sowerby bridge.</p> <p>This will negatively affect everyone's physical and mental health in surrounding areas and as we live in a valley the smoke will stick around for longer, adding to already high air pollution levels due too excess traffic through the area.</p> <p>We all have the right to breathe clean air and not everyone can afford to move out of the area to escape air pollution and we shouldn't have to.</p> <p>Many thanks,</p> <p>XXXXX</p>
140	<p>Dear Calderdale Council</p> <p>I would like to strongly object regarding the installation of an incinerator that is being proposed in our lovely valley, We value our clean air.</p> <p>Regards</p> <p>XXXXX</p>
141	<p>As a local resident I am very concerned about the resubmitted application for an incinerator in Sowerby bridge. This has already been turned down once by a government planning officer. Why is the council refusing to vote on this and is instead asking unelected council officers to decide as they don't represent the local community. There are serious health concerns with the proposed incinerator being sited in an existing air quality management area. I don't feel that there has been enough consultation on this new application or enough time allowed to let local people voice their concerns.</p> <p>I look forward to hearing from you.</p> <p>XXXXX</p>

142

As a life long resident of Sowerby Bridge & an asthmatic I would like to register a strong objection to permission for the incinerator. I am frightened of the detrimental effect the fumes will cause to everyone living in Sowerby Bridge & surrounding villages. As a child of the 1950s I have eternally grateful for the various Clean Air Acts which dramatically transformed my life when coal fires & the chimneys of the factories stopped belching out toxic filth. Sowerby Bridge already has enough pollution from cars & wagons. Please do not condemn further generations to a life of misery caused by avoidable air pollution.

Many thanks  
XXXXX  
Sent from my iPhone

143

#### OBJECTION

I object to the application made by Calder Valley Skip Hire for an Environmental Permit to operate a waste incineration plant at their Belmont Site in Sowerby Bridge.

The reason why I am objecting is because Calder Valley Skip Hire's previous application which went to appeal on 5th August 2023 was refused by a Government Planning Inspector, John Woolcock.

Mr Woolcock, (a professional Government Inspector who's remit is to 'ensure a fair appeal system'), considered the application; listened to legal arguments and read numerous pages of evidence; concluded that he was "unable to find that granting an environmental permit for this site would not have an unacceptable adverse effect on human health and the environment".

In my opinion the Sowerby Bridge community are entitled to breathe clean air.

XXXXX

144 To Whom It May Concern,

I am writing to formally object to the planning application S13/006 for the proposed incinerator at Calder Valley Skip Hire (CVSH). This objection is based on the significant concerns regarding the detrimental impact the incinerator would have on local air quality and the resulting threat to human health within the community.

It is crucial to highlight that this application has been previously denied due to well-founded reasons, primarily focusing on the adverse effects on the environment and public health. Despite previous rejections, the re-submission of this proposal is deeply troubling and raises serious doubts about the accountability and responsibility of the applicant.

The potential consequences of establishing an incinerator at CVSH are many and cannot be understated. Firstly, the emission of pollutants such as particulate matter, nitrogen oxides, sulfur dioxide, and volatile organic compounds poses an immediate and long-term threat to the air quality in our locality. These pollutants are known to exacerbate respiratory conditions, increase the risk of cardiovascular diseases, and have detrimental effects on the overall well-being of individuals, particularly vulnerable populations such as children and the elderly.

Furthermore, the cumulative impact of emissions from the incinerator, combined with existing industrial activities in the area, would result in an unacceptable burden on the health and quality of life of residents. Studies have consistently demonstrated the link between exposure to air pollution and various health outcomes, including respiratory infections, asthma exacerbations, and even premature mortality. As responsible stewards of public health, it is imperative that any proposed development undergoes rigorous scrutiny to ensure the protection of the community's well-being.

In this instance scrutiny has already taken place and the result of said scrutiny was to deny the application. The same must surely happen this time whilst sending a clear message that subsequent applications would be met with the same response so as not to waste any more of the council and communities time.

In light of the aforementioned concerns, I urge the Calderdale Council to uphold its commitment to safeguarding public health and environmental integrity by rejecting planning application S13/006 for the proposed incinerator at CVSH. It is incumbent upon the council to prioritize the well-being of its constituents and to resist any development that compromises the fundamental rights to clean air and a healthy environment.

Thank you for considering this objection. I trust that the council will act in the best interests of the community and ensure

that our voices are heard in the decision-making process.

Sincerely,

XXXXX



145      OBJECTION

I object to the application made by Calder Valley Skip Hire for an Environmental Permit to operate a waste incinerator on Rochdale Road, Sowerby Bridge.

The application is a resubmission of an application dated 5th August 2020 which was refused at appeal on the 5th August 2023 by a Government Planning Inspector, John Woolcock.

The applicant is relying on a ADMS computer model but:-

The ADMS computer model does not use local weather data. The flow of waste gases through the trees and valley cannot be accurately predicted by the computer simulation.

In my opinion the reasons why the application was refused are still relevant – given the height and proximity of the smoke stack to trees and woodland the inspector was “unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”.

I believe that breathing clean air should be a basic right of any community; every resident of Sowerby Bridge should be afforded this basic right; the application should be refused.

XXXXX

146

Hi,

This really doesn't sound like a good idea at all: burning thousands of tons of waste in a highly populated area

It doesn't sound very good for the environment either.

Please register my formal objection to this application,

XXXXX

147

To whom it may concern

Objection to application Calderdale planning S13/006

I would like to make an official objection to application Calderdale planning S13/006.

I live locally and the incinerator is in a built up area, low in the valley and would be a health hazard to the local community as we will be breathing in unknown uncontrolled toxins.

Breathing clean air is a basic human right.

Kind Regards

XXXXX

148 Dear Calderdale MBC Environmental Health,

I am writing to express my strong objection to Calder Valley Skip Hire's application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

This is a resubmitted application after their original proposal was rightfully refused at appeal in July 2023 by a Government Planning Inspector due to concerns about the discharge of waste gases and protecting human health and the environment.

Sowerby Bridge is already an Air Quality Management Area suffering from pollution issues. Having the incinerator just 670 meters away with its smoke and emissions regularly blowing into the valley bottom is unacceptable. There are valid doubts about the air quality models presented not accurately accounting for local weather patterns and inversions that can trap pollutants.

Furthermore, it is extremely concerning that the new application has removed the Council's ability to request site diaries and inspection records to monitor compliance. There must be transparency and oversight over operations.

All elected representatives - councilors across parties and MPs - have rightly opposed this application from the start. Breathing clean air is a basic right that should be protected for our community.

I urge you to listen to the residents and reject this incinerator permit application once again. The risks to our air quality and health are simply too high.

Thank you for your consideration.

Kind regards,

XXXXX

149 Environmental Permitting (England and Wales) Regulations 2016 ("the Regulations")

Application for environmental permit for Schedule 13 small waste incineration plant ref S13/006

Calder Valley Skip Hire, Belmont Industrial Estate, Rochdale Road, Sowerby Bridge HX6 3LL

The above application should be refused because this has been rejected once by a Government Planning Inspector and there have been no changes made by Calder Valley Skip Hire to protect the health of people or the environment. Last time the inspector was unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment. Nothing has changed. Also, the noise would be detrimental to the health and mental wellbeing of local residents of which I am one.

The permit to use the incinerator should be refused.

XXXXX

150 Dear Sir or Madam,  
I write on behalf of my family at  
XXXXX

We object YET AGAIN to the proposed incinerator at Belmont on grounds of noise and pollution to our environment.

Anyone who knows this steep-sided Ryburn Valley can often see mist/clouds across the valley. I understand it is referred to as temperature inversion. The top of the flue will be BELOW the level of our house at Brockwell. The incinerator gasses from Belmont will not dissipate due to the geography of the site.

I am also a member of XXXXX,  
where we will be similarly affected.

Yours Sincerely  
XXXXX

151 Good afternoon,

I am writing to object against the potential incinerator being built in Sowerby Bridge at Calder valley skip hire.

Living on XXXXX I am concerned that this will cause smoke and gases to lie low down in the valley making it polluted and potentially lowering house prices and the appeal of our beautiful area. It is also a concern for what this would do to wildlife in the surrounding woodland area.

This has been refused once and for good reason, there is no reason why this should be passed and does not benefit the area in any way.

Thank you  
XXXXX

Sent from my iPhone

152

Ref:

Application for environmental permit for Schedule 13 small waste incineration plant ref S13/006  
Calder Valley Skip Hire, Belmont Industrial Estate, Rochdale Road, Sowerby Bridge HX6 3LL

Dear Calderdale Council

Please add my name to the list of those who wish to object to the above-mentioned planning application.

I'd merely make the point that anyone with an ounce of common sense would quickly realise that to build an incinerator in the bottom of a steeply-sided valley, one which already suffers from poor air quality, is simply asking for trouble.

The air along the whole valley often becomes visibly layered or stratified, due to atmospheric conditions which traps air in the valley bottom.

I cannot imagine that anyone in Sowerby Bridge would want to make matters worse than they already are by supporting this reckless planning application.

XXXXX

153

I wish to object to this application. The site is entirely unsuitable for purpose. The toxic plume emissions from this incinerator will produce fumes which will stagnate over the floor of this narrow steep sided valley. This operation is certain to be injurious to the health of all residents... I urge all those concerned in this process to reject the application ...  
XXXXX

I am a lifelong resident of Calderdale and live alongside all my family... this application promotes a huge anxiety for many families living in the Ryburn Valley ..fear for the health and well being of grandchildren being a major concern ... I urge you all to reject this application ...  
from my iPad

154

I object strongly to this disgraceful scheme  
XXXXX

155

Hello,

Further to the subject planning application in respect of an Incinerator in Sowerby Bridge. I would like you to register my objection to the application, and also object to the Incinerator going forward.

I have lived in Sowerby Bridge for over 35 years, and note that air quality has declined in this time. I feel that the air quality would be further adversely affected by the approval of the Incinerator.

Yours faithfully,

XXXXX



156

Dear Sirs/Madam,

Thank you for all your hardwork in relation to previous planning applications in relation to an incinerator by Calder Valley Skip Hire.

I live in the locality of the site and having read and listened to the debate on this subject, I request that you take this as my formal objection to the planning application.

Submitted for your consideration

XXXXX

XXXXX

XXXXX

Second Email:

Dear Sir/Madam,

Calder Valley Skip Hire SWIP application - Objection.

Ref S13/006

Issues of concern

1. Unknown impact on human health : harmful emissions

The modelling of air pollution does not satisfactorily represent the conditions in the valley even with rough surface calculations. The stack height is low, the point of emission is near level with the houses on Rochdale Road and the mixing of air / dillution of pollution at the pount of emission is unknown. There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on 1 particular model which does not allow for the topography, the woodland, the inversions in this valley.

Each report for air quality, uses terms like, estimates, projected, calculated based on a model of air distribution at leeds airport. Some parameters have been set with the agreement of CVSH which is inappropriate. The valley suffers from inversions which will keep the pollution in the air that we breathe at low levels. The stack height should be much higher

in this location.

Is it really acceptable to allow a risk to human health levels of dioxins and furans are predicted to be higher in the area and yet these are only estimates. On this basis alone the permit should be refused. The flue is not high enough to achieve dilution - the risk to human health has not been adequately determined and the effect on human health will be SIGNIFICANT.

## 2. Air quality

The addition of this significant amount of emissions to atmosphere will impact on air quality within the boundary. The data provided by the applicant shows much higher pollution levels at Spring hill mills area, this is due to prevailing wind conditions. Pollutants when they are able to disperse in the winter months will likely blow into the AQMA having a seriously detrimental impact on air quality within the AQMA and surrounding areas.

The original submission suggested that there wont be an increase in waste transfer in or out of site. This is incredulous. A business will operate to achieve maximum profit. It is profitable now bringing in waste sorting and moving waste to landfill. This operation will continue and the site will take in more waste to burn - numbers of vehicles to site will likely double if not triple. The effect on the AQMA will be SIGNIFICANT.

## 3. Noise

The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door open for much of the time impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that during the day but especially at night.

## 4. Flora and Fauna

Much has been made of the trees which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact of hot gases on these trees, how these harmful chemicals will affect the local ecology? Deer roam the woods, badgers, cuckoos, the woods are alive with birds and animals, how is nature to be protected. The flue is not high enough to allow gases to escape and the environment will be harmed.

## 5. Enforcement

CMBC have insufficient resources to ensure adequate enforcement a severe lack of specialists to deal with such a site,

and there is also an apathy towards enforcement. The Authority has been threatened with litigation by CVSH, how so can they then take enforcement action against them now?

6. Probable amendment to hours of operation

As above the company will want to make profit, it is likely (more than likely) that they will want to extend operating hours which will further impact on the matters raised above.

REFUSAL ON THE GROUNDS:

Inadequate dispersal and dilution of chemicals which are harmful to human health.

- \*The Stack height is inadequate

- \*Dilution is negatively affected by the location of the of the plant in the valley bottom

- \*Dispersal is negatively affected by the location of the emission point of the flue

- \*Dispersal is negatively affected by the trees

- \*Dispersal is negatively affected by inversions

- \*Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology.

THE PERMIT SHOULD BE REFUSED

Submitted for your consideration

XXXXX

157	I'm writing to object to the application by Calder Valley Skip Hire to operate an incinerator in Sowerby Bridge. XXXXX  Sent from my iPad
158	This should NOT be granted, we do not want this to happen period, we talk about eco friendly and then we allow this, it must not be aloud regards XXXXX my fellow Labour alike do not want this either  Sent from Outlook for Android

159 Dear Calderdale MBC Environmental Health,

I am writing to express my strong objection to Calder Valley Skip Hire's application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

This is a resubmitted application after their original proposal was rightfully refused at appeal in July 2023 by a Government Planning Inspector due to concerns about the discharge of waste gases and protecting human health and the environment.

Sowerby Bridge is already an Air Quality Management Area suffering from pollution issues. Having the incinerator just 670 meters away with its smoke and emissions regularly blowing into the valley bottom is unacceptable. There are valid doubts about the air quality models presented not accurately accounting for local weather patterns and inversions that can trap pollutants.

Furthermore, it is extremely concerning that the new application has removed the Council's ability to request site diaries and inspection records to monitor compliance. There must be transparency and oversight over operations.

All elected representatives - councilors across parties and MPs - have rightly opposed this application from the start. Breathing clean air is a basic right that should be protected for our community.

I urge you to listen to the residents and reject this incinerator permit application once again. The risks to our air quality and health are simply too high. Think about all those children playing out in school and nurseries....

Thank you for your consideration.

Kind regards,

XXXXX

160

Hello,

I'm writing to object to the incinerator in Sowerby Bridge.

My name is XXXXX of XXXXX.

As a mother of two children under the age of XXXXX, having an incinerator in such close proximity to nurseries, schools and the centre seems ridiculous to me in a time where there is such focus on health and environmental footprint. If this incinerator was to go ahead, I would unfortunately look to move away from the area.

It is very frustrating that this application has been submitted after being overturned last year. At what point will applications stop - will it be a constant process of battling this until it gets approved?

I sincerely hope that the voices of the residents are heard, as this not only impacts health and the environment, but economic prospects in the area too.

Regards,

XXXXX

161

Hi my name is XXXXX and I reside at XXXXX.

I'm distressed to hear that this company would want to burn rubbish in a valley that the air movement is very volatile to non movement.

I suffer from a lung disease and live east of this site , I would directly be affected by any emissions from this site and strongly urge you for the sake of the future health of our children or grandchildren to turn down this application.

I thank you in advance for your common sense in this matter . Thank you

Sent from my iPhone

162

hi,

I am writing to state that I am against this proposal.

Today I reside on XXXXX less than XXXXX metres from the proposed site.

I moved back to the area of Norland to enjoy the good air quality & the lovely countryside.

I am retiring from work in the next few months & I intend to spend majority of my time during the summer months on outside activities.

These include gardening, walking on/around Norland moor & playing golf at the golf course

on the Norland hillside. These outdoor activities assist my health, which is currently good but I do

suffer with Asthma. From a personal view, I am very unhappy about this proposal, from what I understand

it will impact my retirement. While the impact to myself is short term I am very worried for the younger

generation who will be impacted longer term, especially those in local schools & young families who live nearby.

Yours sincerely, XXXXX



163

Hello,

I am writing to object to the planned proposal of the incinerator by Calder valley skip hire.

I live in the valley and have a young baby, as well as family members who suffer from respiratory issues and fear the planned incinerator could lead to unnecessary pollution and therefore negatively affect the health of the population living close by. Our health and wellbeing should be the priority and Calder valley skip hire should be asked to make alternative plans which do not have any potential to harm the residents of sowerby bridge.

Many thanks,  
XXXXX  
Resident of XXXXX

164

Dear Sirs, I would like to object to the above application in the strongest possible terms .As a local resident I have experienced the pollution from the Sowerby Bridge site first hand when they had a fire on sit .I witnessed to smoke and pollution travelling at low level down the Ryburn Valley and eventually engulfing my house. I had to leave the house for a day as it was hard to breathe .The application is also not based on local weather data for Sowerby Bridge where I have experienced temperature inversion weather systems resulting in fog and pollution staying in the valley bottom all day. The main road through Sowerby Bridge is already congested and the additional traffic and pollution generated by the granting of the permit would make a bad situation even worse.  
Thankyou for your consideration .XXXXX

Dear Sir or Madam

I would like to object to the application for an Environmental Permit, made by Calder Valley Skip Hire, to operate the proposed incinerator on Rochdale Road in Sowerby Bridge.

I believe that the operation of this incinerator will have a severe adverse effect on the environment of Sowerby Bridge and the surrounding area and sadly the health of the residents and other Calderdale residents accessing the Sowerby Bridge amenities such as the Leisure Centre, Shops and Restaurants.

The Ryburn Valley (A58) main road is usually gridlocked by local traffic and traffic travelling to and from the motorway (M62), with noticeable exhaust fumes. There is now only one Council Leisure centre in the local area and the only place for school children to learn to swim. Hence an increased number of coaches and residents from outside Sowerby Bridge accessing the pool. All this means an increase in air and noise pollution which impacts adversely on the town and residents. Sowerby Bridge often looks dirty and unkempt, and it is only thanks to local residents who litter pick that the area does not resemble a tip.

I agree with the points detailed on the local residents' objection and believe that because of the geography of the valley the air and noise pollution will be trapped in the valley, especially at the times of inversion fog. Smoke and mist regularly lie in the valley bottom and inversion can stop waste gases from dispersing. Sowerby Bridge is already suffering from pollution, being in an Air Quality Management Area.

It is particularly important to think of the affect upon children; with homes and 12 schools within 2kms from the Incinerator. That is thousands of children whose health could suffer. Breathing clean air should be a basic right for us all.

There are no environmental gains to issuing this permit. Nationally and even locally we already have more incineration capacity than needed. Instead of burning this waste (including plastic from crude oil) and increasing carbon emissions and contributing to climate change, we should be recycling 50% more. Economically and environmentally, there are more jobs in recycling than incineration. Scotland and Wales already have a moratorium on new incinerators, England, and Calderdale should now follow suit.

I am surprised that this application/resubmission has come back to planning as a hearing was held on 29-30 November 2022 and 31 May 2023, with a Site visit 1 December 2022. To my understanding the Secretary of State appointed as Inspector Mr John Woolcock BNatRes (Hons) MURP DipLaw MRTPI to make a decision regarding the Environmental Permit. On 5th July 2023 the Judicial Review concluded, where the main issues were the effects of granting an environmental permit for a SWIP on human health and the environment, that the impact of the SWIP on air quality was undoubtedly negative.

There was a particular concern that the discharge height would be below the tops of nearby trees and at a lower level than Rochdale Road. (A table was provided) The above table indicated that the tops of nearby trees would be significantly higher than the proposed discharge height of the stack, and at relatively close separation distances. Many of these trees have a long life expectancy and so any adverse effect they might have on dispersion of the plume would be likely to persist for a considerable time.

In the circumstances, Inspector Mr John Woolcock was 'unable to find that waste gases from the SWIP would be discharged in a controlled way by means of a stack the height of which is calculated'. He was not satisfied on the evidence adduced that 'the proposal complies with IED Article 46 1., which requires that waste gases from waste incineration plants and waste co-incineration plants shall be discharged in a controlled way by means of a stack the height of which is calculated in such a way as to safeguard human health and the environment'. Furthermore, he was 'unable to find that the necessary measures have been taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.'

There is also some concern that CMBC has shown only limited understanding of the regulatory processes and that there is no evidence that CMBC has the technical expertise to regulate this facility.

Inspector Mr John Woolcock said that he was 'unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment.'

I fail to understand why Calder Valley Skip Hire was allowed to put in a new application rather than appealing against Inspector Mr John Woolcock's decision.

Sadly, it has been suggested that some councillors feel intimidated by CVSH and their legal team. I do so hope this is not the case with Council Officers.

Sowerby Bridge has areas with high rates of deprivation and poor health already, please do not approve this Environmental Permit and add to the further deterioration of the environment and health.

XXXXX

166 Dear Sir/Madam,

I wish to register my “strongest possible objection” to the application to operate an incinerator by Calder Valley Skip Hire at the Belmont site in Sowerby Bridge. Nothing has changed since the environmental permit was denied previously.

I live in the immediate vicinity of the proposed incinerator with my partner and the findings of the inspector obviously still apply.

Myself and my partner have been fighting cancer over the last 15 years. My partner is on his 3rd bout of lung cancer and now also has throat cancer and we both have severe breathing issues and find the valley already has extremely poor air quality. How can this application be considered again when it has been refused on numerous occasions?

In Sowerby Bridge and the surrounding areas there are a large number of people living with extremely serious breathing issues and other medical conditions which are not helped by the poor air quality! Why should we have to put up with additional fumes adding to the already poor air quality and suffer from even more poor health?

It's about time this was brought to a halt and some thought given to the lives and poor health of the people who live in this area.

XXXXX

167 Good morning

Objection to the very idea of putting a waste incinerator into a steep sided heavily populated valley.

How can this be even seriously considered due to public health reasons is beyond me. The particulates will linger due to topography. There is also a well known climatic heat sink (for want of better words) over Sowerby bridge preventing pollution going.

This is 2024 not Victorian times.

Thank you for your assistance

XXXXX

Sent from my iPhone

168 Good Morning,

I would like this email to be considered as my objection to CVSH building an incinerator in or near Sowerby Bridge. This issue has been going on since 2016, 8 years. I went on protest marches with my 6 year old daughter. She is now 14!!!! Sowerby Bridge is a valley with steep sides. The Government's Inspector stated that given the height and proximity of the smoke stack to the trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment". In this latest submission none of these issues have been addressed and the health of residents, wildlife and the environment is still in danger. Sowerby Bridge already has poor air quality and is in an Air Quality Management Area. An incinerator like this, burning 10,000 tonnes of waste, 5 days a week, 24 hours a day can only have a negative impact on the air quality of the area.

Please listen to the local residents who will have to live with the consequences of the incinerator.

I can only hope that the right decision is made that protects the residents of Sowerby Bridge.

Kind regards,

XXXXX

169 I wish to register my objection to the application by Calderdale Valley Skip Hire (CVSH) to operate an incinerator at the Belmont, Sowerby Bridge site.

This application is a resubmission of an application dated 5th August 2020 which was refused at appeal on 5th July 2023 by a Government Planning Inspector, John Woolcock. Mr Woolcock was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment"

That should surely have been an end to the matter but It seems that CVSH will not take no for answer. I trust that Calderdale Council will uphold the refusal by a Government Planning Inspector.

XXXXX

170

Dear Sir/Madam,

We wish to register our "strongest possible objection" to the application to operate an incinerator by Calder Valley Skip Hire at the Belmont site in Sowerby Bridge.

Nothing has changed since the environmental permit was denied previously.

" Unable to find that granting an environmental permit for SWIP would not have an unacceptable adverse effect on health and environment"

We live in the immediate vicinity of the proposed incinerator and the findings of the inspector obviously still apply.

XXXXX

171

Dear Sir/Madam,

I wish to register our "strongest possible objection" to the application to operate an incinerator by Calder Valley Skip Hire at the Belmont site in Sowerby Bridge.

Nothing has changed since the environmental permit was denied previously.

" Unable to find that granting an environmental permit for SWIP would not have an unacceptable adverse effect on health and environment"

I live in the immediate vicinity of the proposed incinerator and the findings of the inspector obviously still apply.

XXXXX

172 To whom it may concern.

I wish to register my opposition to locating an incinerator off Rochdale road in Sowerby Bridge

An incinerator should not be located in a valley near to an urban population. It is detrimental to the environment and to the health and welfare of the local community.

Thank you

XXXXX



Dear Sir / Madam,

I am writing to oppose the granting of an environmental permit to Calder Valley Skip Hire Ltd (CVSP) for the operation of a small waste incineration plant (SWIP) at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.

In support of my opposition I would draw your attention to the following points:

#### Air quality

The CVSP Environment Statement Addendum, which is a replacement for Chapter 7 of the 2017 Environment Statement (ES) states in paragraph 3.43 that with regard to dispersion of pollutants..

“The most important meteorological parameters governing the atmospheric dispersion of pollutants are wind direction, wind speed and atmospheric stability as described below:

- Wind direction determines the sector of the compass into which the plume is dispersed;
- Wind speed affects the distance that the plume travels over time and can affect plume dispersion by increasing the initial dilution of pollutants and inhibiting plume rise; ...”

Yet in paragraph 3.45 it states that “Dispersion model simulations have been performed using five years of data from Leeds-Bradford Airport between 2013 and 2017.”

Leeds/Bradford airport is approximately 25km from the proposed development site. It is on flat ground, surrounded on half of its perimeter by urban development and most significantly some 207m AOD.

The development site is in a steep sided valley surrounded by trees and which is itself subject to a local microclimate that causes frequent weather inversions. In addition, the revised stack height quoted is only 96.4m AOD, more than

100m less than the site where the modelling data came from.

Models are only as good as the data you put into them. I question how data from a site of widely different terrain, over 25km away, and more that 100m higher, can be used to drive a model for this site.

Incinerators are known to emit highly toxic substances that can build up over time and cause all sorts of damage to health.

Surely we should err on the side of caution when dealing with these potentially harmful substances and reject this modelling.

The previous application was rejected by the Government inspector on air quality safety grounds and this new modelling does nothing to address his stated concerns around the discharge of pollutants in a controlled and safe manner.

#### Increased Traffic

Sowerby bridge is well known for its level of traffic congestion. Increasing the flow of heavy goods vehicles to the site (the application quotes 120 journeys per day, 60 in and 60 out) will further exacerbate this and do nothing to improve air quality in the town itself.

#### Oversight

I notice the right of the Council to request copies of records to monitor compliance has been seriously weakened in this second application. This does nothing to allay fears and speaks more to lack of concern over any potential impact to air quality for the local community.

#### Council long term aims

Councillors have historically fought long and hard over decades to try and improve air quality for the residents of Sowerby bridge. Granting a permit in these uncertain circumstances would be a backward step.

#### Summary

This is a potentially harmful development for which the applicant has still not demonstrated an adequate response to the findings of the Government Inspector and the application for a permit to operate a SWIP should continue to be rejected on those grounds alone.

Yours faithfully

XXXXX

174 Good morning,

I am writing to raise my concerns about the application for an Environmental Permit for the proposed Sowerby Bridge incinerator at Rochdale Road. My objections are threefold:

When the Application was refused by the Government Planning Inspector he highlighted that it was unclear that the waste gases would be discharged in a controlled way, and indeed the computer model did not use local weather data. Given the prevalence of temperature inversions in the valley I think the incinerator is only likely to add to poor air quality in the area. Arguably this calls the validity of the modelling into question.

The way this is being handled by the council seems designed to avoid scrutiny - the lack of a council vote and asking Officers to decide the application.

The implication, by the Council taking out the right to request inspection records at any time, that the level of scrutiny and compliance monitoring will be reduced.

I trust that the officers will do the right thing for the Valley and reject the application.

XXXXX

175 I would like to protest against the plans for the siting of the incinerator plant. It will affect everyone in this area's health and pollute the area. XXXXX

176 I am writing to object regarding the environmental permit application for the incinerator at Calder Valley Skip hire.

This was refused after appeal in July 2023 by a government planning inspector, John Woolcock.

I strongly believe this original decision should be upheld.

The incinerator height is insufficient and the proximity of the stack is too close to houses, trees and woodland. As the government inspector said he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment".

Calder valley skip hire is located in the bottom of a steep valley, smoke and mist regularly lie in the valley bottom and this would only add to poor air quality that Sowerby Bridge already suffers from.

Who is going to monitor the compliance of the incinerator if it is given the go ahead?

Before any decision is made it should go to a Council vote with a public meeting. This would show the strength of feeling within the community to object to the incinerator. The community should be heard.

Please acknowledge receipt of this email.

Regards

XXXXX  
Local resident

177

Ref S13/006  
Belmont Industrial Estate  
Sowerby bridge

I wish to lodge my objection to the new EP application submitted by CVSH to the Council.

In a decision dated 5 July 2023, John Woolcock, of the planning inspectorate, considered the EP put forward by CVSH at appeal. In his decision the inspector concluded -

" I have taken into account all other matters raised in the evidence but have found nothing to outweigh the main consideration that lead to my conclusions. I am unable to find that granting an EP for the SWIP would not have an unacceptable adverse effect on human health and the environment.

In accordance with Regulation 31 (6) EPR 2016 the appeal is dismissed and the refusal stands."

Nothing physical has materially changed in the new EP application e.g. stack height, trees, topography etc therefore the inspectors decision is still robust and should stand and this is the basis for my objection.

I appreciate that the Council has to consider this new application by CVSH at face value however I trust that it will reach the same conclusion as the government inspector, otherwise where will we be where an appeals process can be circumvented / undermined simply by submitting a fresh application without actually changing anything each time the applicant receives an unfavourable decision.

Please acknowledge receipt of this email.

Thank you.

XXXXX

Resident of XXXXX

178

I wish to object to the application by CVSH for an environmental permit for the proposed Incinerator on the following grounds.

1. As there are no other working incinerators based in the bottom of a heavily wooded valley the computer modelling cannot be relied upon and therefore there is an exponential risk to the public health.
2. The input data for the modelling is using data from the Leeds / Bradford area which is dramatically different to the weather condition at the bottom of the Ryburn valley.
3. There does not appear to be risk assessment availability for the public to view.
4. The operation of the site has led to a serious fire in the last year which clearly showed the affect temperature inversion has on dispersal of the gasses.
5. The area of Sowerby Bridge is already considered to have a poor air the incinerator can only add to this.
6. Burning the proposed amount of fuel for over 200 days per year will add significantly to the CO2 emissions and therefore global warming.
7. This Incinerator had been the subject of local concern for over 8 years and a recent application has been turned by the Government appointed Inspector. Yet Calderdale are passing the decision to an employee of Calderdale for a decision.

The handling of this application by Calderdale is an affront to the basic principles of democracy and an insult to citizens of Sowerby Bridge to which they have a moral responsibility for.

XXXXX

Sent from my I phone

179 After being present at the very successful public meeting in Sowerby Bridge on Saturday, I have to make you aware of the feelings of myself and everyone at the meeting.  
I am strongly opposed to this facility.  
On the grounds that it will be very unhealthy in the Sowerby Bridge and surrounding area if the incinerator is to receive the permit, the air pollution and the damage to the overall environment is still a very big threat and will always be.  
The valley that they are proposing to work this incinerator in is and always will be too low.  
The plume stack can not no matter how high it is built will not disperse the fumes away.  
I am as everyone at the meeting was concerned about the fact that this incinerator was refused a permit in July 2023 .  
BUT it seems that they are able to reapply for a permit in April 2024?

Surely the government inspectors are not wrong??

I implore you to listen to the voice of the public of the area as has also been expressed by all our local members of the Calderdale council.

Do not support the permit for this incinerator.

VOTE NO .

Thanks regards XXXXX ( resident of XXXXX)

Sent from my iPad

180 Please be advised I am totally against the proposal of an incinerator at Calder Valley Skip hire.

The affect on the valley will be catastrophic, for many reasons. Especially to the well-being of the residents. There are too many schools and nurseries in the vicinity which will be affected, plus the environment of the valley.

With the development of tourism in the area we should be protecting our environment not damaging it. Environmental pollution is the forefront of everything at the moment so why this second proposal, after the first one being denied by a government inspector is being considered beggars belief. Sowerby Bridge is already suffering from pollution and is in and Air Quality Management Area.

Regards  
XXXXX



Sent from myMail for iOS

181 To whom this may concern:

I strongly wish to object to the above incinerator application as a resident of the Ryburn Valley.

For approximately 80 years, I have enjoyed breathing in the clear air, do we really need anymore pollution?

There is already more than enough pollution with all the cars, lorries and the congestion within Sowerby Bridge and the surrounding area. Do you really want residents within this area to suffer health conditions adding pressure to an already over stretched NHS. Also do we want to be irresponsible to future generations and subject them to health conditions that they needlessly may not need to suffer.

Nationally research shows that there are enough incinerators so why do we need more? when everything is focused on making the environment greener, HOW a does this help the environment.

XXXXX  
Resident of XXXXX

182

Dear Calderdale,

I see that to object to the application by a known group of polluters re-submitting an application I have to email in.

I object on the following grounds:

They already submitted for this and were rejected.

The area is a valley with a known and well documented atmospheric thermocline which traps pollution from existing industry.

This would trap all output from the incinerator and degrade the already poor air quality.

I note the number of schools that would be affected by this.

The valley traps smog and this was a major objection last time. I assure you the local geography has not changed since

Currently the environmental oversight for Calderdale is underfunded and would not be able to monitor this incinerator -

The company owns several other incinerators and has breached their permitted emissions and pollution levels with each and every site.

The existing infrastructure is not suitable for delivery vehicles and would cause dangerous traffic as well as untenable wear on the existing roads and surrounding buildings

Existing protected, historic and traditional buildings would suffer massive ongoing damage from the extra pollution, that could not be undone.

There's nature reserves in the area that would suffer greatly from an incinerator dumping particles and waste gasses (Carbon Dioxide, carbon Monoxide)

Individuals like myself who have respiratory issues would suffer significantly.

Nobody here wants to live under a cloud of burned rubbish, or have to wear a filter mask to breathe without significantly raising their risk of lung cancer due to carcinogens. If the potential owners of this incinerator are so desperate they can build it in the extensive back gardens of their mansions - They undoubtedly have the room and seem to feel it's in their own interest.

It is, however, not in the best interest of anyone living around here who needs to use the roads or breathe the air or maintain their dwellings, or who has any interest in the developmental health of their children

--

Kind regards,

XXXXX

183 I object to the new application for an incinerator at the CVSH site in Sowerby Bridge on Environmental Health grounds. A previous application was refused by the government planning inspector on health grounds and there has been no evidence relating to the SB area that reverses this decision.  
I suggest that this application is delayed until detailed environmental impact research is conducted including a flood risk for the area.  
As the council is not taking a vote on this issue, I am concerned that this decision is being made by unaccountable officers. I suggest that this opens these officials and council members to a class action regarding public health issues, especially as the government has established that there is a health risk associated with this application.  
Yours sincerely XXXXX

184 To whom this may concern

I wish to make a strong objection regarding the above.

I have enjoyed living and breathing the clear air within the Ryburn Valley for the last 50 years.

The thought of an incinerator within Sowerby Bridge is a very scary and dangerous prospect to an asthmatic, when we already have more than enough pollution with all the traffic congestion that already pollutes the air within Sowerby Bridge and the surrounding areas.

How do you justify to future generations that the reason they suffer unnecessary health conditions is that an incinerator was built in area where air quality and pollution was already high

I would urge you to rethink this, do you want to put extra pressure on on an already crippled NHS when there is increase in respiratory disease.

XXXXX

185 I wish to object against the proposed application on the following grounds:-

#### Challenge the noise survey results

- 1) Noise report and monitoring was taken in 2019 (five years ago) and cannot be a guarantee of representative monitoring in 2024
- 2) The noise monitoring taken at receptors does not include the increased operations at site or increased traffic during site operation so is not a true measure of at receptor levels.
- 3) No details of the sound level meter calibration have been provided in the report so cannot be checked against required standard. As no details of calibration of the sound level meter were provided so it cannot be proven that the analysis is accurate. Calibration must be performed at the start and end of the measuring period if following the British Standard.
- 4) The noise levels being recorded at some of the receptor locations at 3 am are very low (19 dBA for example at 90 Rochdale Road ) for example. Typically a digital sound level meter is calibrated using a calibrator at 94 dB (or 104 or 114dB) depending on the calibrator used. SLM are typically used for industrial noise level determinations at or above the action levels in the Control of Noise at Work Regulations 2005 of 80 dBA. Using a calibrator at 94 dB for results at less than 30 dBA is inappropriate and cannot ensure the SLM is accurate at these levels. This invalidates the report. The calibrator used was a Larson Davies 200 so calibrates at 94 or 114 dB but only at 1 kHz frequency.
- 5) A single noise survey was taken on 23rd May 2019 and used to model all results. This date does not take into account any seasonal variations that could affect the survey (environmental conditions for example) and is a single stand alone survey . Multiple surveys over multiple conditions should have been taken.
- 6) There are no background control levels stated in the report.

#### DSEAR assessment

It is stated that there is diesel, oil and gas cylinders stored on site but there is no report stating that a DSEAR (Dangerous Goods Explosive Atmospheres Regulations) assessment has been carried out so this risk is not managed.

#### Electrical installation testing

The five year fixed electrical installation certificate is from September 2016 so is out of date and legally non-compliant.

### Fire risk management

In the event of a fire there should be a means of ensuring that any surface run off from water used to tackle the fire does not run off site . No management system in place. Run off a risk to environment.

### Air Quality and emissions

Installing a continuous MCERTS certified monitor for some air quality parameters does not stop emissions leaving site unless linked to a full SCADA system and having trained people on site to operate both, ideally someone with MCERTS level 2 qualification and the technical qualifications as well. There is no point giving a Lamborghini to someone with a cycling proficiency badge. If the levels exceed emission parameters then there must be a system in place to ensure the process is closed.

In terms of dioxin and PCB analysis performing this just every six months is inadequate in terms of any Permit. This should be monthly until there is a history of results and then based on risk assessment this could be reviewed.

I appreciate your feedback on these and please log as objections.

186

I am contacting you to lodge my vehement objections to any granting of yet another application for operation of an incinerator at the Belmont site of Calder Valley Skip Hire. A repeat of the same application that was rejected emphatically by a Government inspector last July. The applicant didn't appeal that decision because they knew they wouldn't win – instead they are now trying to get an Environmental permit involving yet another costly application; backed by inaccurate data.

I attended the crowded public meeting last Saturday and was appalled to hear that Halifax Council – elected by us and whose role is to represent OUR interests; have abdicated their responsibility and delegated the decision on this application to un-elected council officers. This is ludicrous when local councillors and MP's are united in their objection to this resubmitted proposal.

The Government Inspector stated that the plans rejected last year did not guarantee the safe dispersal of the dangerous waste gasses. The new application uses weather data from Yeadon, remodelled into what they now say they would expect here in Sowerby Bridge. This is patently ridiculous! Yeadon is high on a hill, in a completely different valley to the site proposed here, deep in the narrow densely wooded Ryburn valley.

The smoke from fire in 2017 at the same waste site clearly demonstrated that any discharge will lie heavily in the valley for a long time. This could also be worsened by inversion in this narrow valley. No-one here should be exposed to any more pollution than we currently suffer.

The Government has set a limit to the volume of waste that should be burnt annually. The current national incinerator capacity already exceeds this limit by some distance. The Government has also said it plans to cut this figure even more in the following years. SO THERE IS NO NEED FOR THIS INCINERATOR AT ALL. The Applicant only wants to make money at the cost of our health – clearly something they don't care about. I DO CARE! AND SO SHOULD YOU!

What are you going to do about it?

Yours, in the hope that justice and sanity will prevail.

XXXXX

187	<p>To Whom It May Concern,</p> <p>I am writing to strongly object about the proposed planning of the incinerator in Sowerby Bridge.</p> <p>I cannot believe that this is even being discussed.</p> <p>The health of my community means a lot to me as it does to others and with a proposal of tons and tons of waste burning 24hrs a day will have a huge impact in the immediate area and along the Ryburn Valley.  Not only will the smell of waste burning on such a scale be an issue, the environmental impact will be enormous.  In this day and age I am sure you must see this as a negative and I strongly suggest that this is rejected on all levels.  Kind regards,</p> <p>XXXXX</p>
188	<p>Dear Sir/Madam,</p> <p>We wish to register our "strongest possible objection" to the application to operate an incinerator by Calder Valley Skip Hire at the Belmont site in Sowerby Bridge.  Nothing has changed since the environmental permit was denied previously.</p> <p>" Unable to find that granting an environmental permit for SWIP would not have an unacceptable adverse effect on health and environment"</p> <p>My parents live in the immediate vicinity of the proposed incinerator and the findings of the inspector obviously still apply.</p> <p>XXXXX</p>
189A	<p>I would like to again express my objection to these proposals in SBridge .there are obvious health issues for the local community .  This should not be allowed  Thank you  XXXXX</p>

189B Surely an informed decision is based on data / info from experts , not just pushed through by a bullish narrow minded approach by a company who does not have the local community / health in mind . The site is unique and cannot be compared to sites in Leeds etc  
Surely Calderdale must consider the health of residents ?  
Met office cannot meaningfully assess conditions within Ryburn valley.

Email from met office.

We are more and more often being asked for site specific historical data sets and ongoing forecasts which we can support with by blending together several super computer weather prediction models which incorporate real-life surface, satellite cloud and radar rainfall observations. By combining the models we are able to cancel many errors and produce more accurate forecasts and best estimates of actual considering the conditions for the site location. We are only able to go back a maximum of 5 years using this process, but this would provide data for the exact location which could be compared with the actual observations for the weather stations being used and give a truer representation of the actual site location conditions.

My email to The Met Office

I right in saying that there is no actual historical data for HX6 3LL Incinerator site, and would rely on data from the nearest weather station.

If this is the case how much will it cost for 5 years of data for HX6 3LL and would that include episodes of inversion in the valley?

Reply from XXXXX Met Office

Apologise for the delay here but I have been speaking this through with a senior data scientist and he has said the below:

Unfortunately that is exactly the kind of application we cannot support. That is a very narrow, deep valley (~500m wide) that simply will not be resolved by our analyses or NWP (2km). We could not meaningfully assess conditions within that valley. Meteorological convention would suggest that valley would be prone to inversions/cold air pooling.



Appalling situation and confidence in Calderdale severely impacted . Residents not profit or back ganders need to be considered  
XXXXX

189C	<p>the site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution</p> <ul style="list-style-type: none"> <li>- the site is at risk from flooding</li> <li>- insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict</li> <li>- competence of CVSH to run an incinerator</li> </ul> <p>Thank you</p>
190	<p>I strongly object to this ridiculous idea of an incinerator in the Ryburn Valley. The pollution is bad enough in Sowerby Bridge without adding to it.</p> <p>Yours sincerely XXXXX</p>
191	<p>Dear Calderdale MBC Environmental Health</p> <p>I would like to register my objection to the above application on the grounds of the detrimental effect on air quality in Sowerby Bridge.</p> <p>XXXXX</p>

192

I object in the strongest possible terms to the making of this further application to have an incinerator in the deep v-shaped valley of Sowerby Bridge. Due to the topography of the region the acrid smoke generated by an incinerator will be unable to leave the valley. This will have an extremely detrimental impact on the lives and health of the people living and working there.

Sowerby Bridge is already in an air quality management area and it is ludicrous that this proposed incinerator is even being considered by the council. It is to be noted that the council is refusing to vote on this matter (what a cop-out!) and is instead leaving it to Council officers, who have little to no experience or expertise in this matter, to decide the future of the entire valley.

A Government Inspector, who is ranked much higher than the local council officers with many years' experience, has already stated that he was:

"unable to find that the waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment."

The original application stated that: "Calderdale may request copies of the inspection records at any time". Please bear in mind that this has been taken out of this new application. This will significantly impair the council's ability to monitor compliance.

It is telling that the company applying to build the incinerator did not appeal this inspector's decision but has instead re-applied to the council officers. If this application is granted be assured that there will be a public outcry and a call for an investigation into this matter.

We do this not because we are being vindictive but because we are genuinely and deeply concerned about the effect this incinerator will have on the lives and health of we people living in the valley.

Please do not make the mistake of taking any of these objections lightly. We have funds available and are willing and prepared to fight this further.

ALL local councillors of ALL political parties and BOTH local MPs have opposed this application from the beginning.

Please make sure you make the right decision.

XXXXX

193	<p><b>OBJECTION</b></p> <p>I object to the application made by Calder Valley Skip Hire for an Environmental Permit, to operate a waste incineration plant at their Belmont Site in Sowerby Bridge. A previous application for the same site and same incinerator was on 5th August 2023 refused by Government Planning Inspector, John Woolcock.</p> <p>It is my opinion that for this Environmental Permit the applicant's agent, has submitted more theoretical air quality modelling data in a further attempt to try and demonstrate that the waste incinerator flue gases will disperse in a safe manner despite being sited low in a steep sided valley bottom and surrounded by trees.</p> <p>I do not want a waste incinerator in Sowerby Bridge.</p> <p>XXXXX</p>
194	<p>To whom it may concern</p> <p>I am writing to present my objection to the application by Calderdale Valley skip Hire to construct and use an incinerator at their plant on Rochdale Road, Sowerby Bridge.</p> <p>It will cause untold pollution and noise in the valley which is unacceptable and unsafe for residents.</p> <p>This application has been refused previously and there is significant opposition from residents, Councillors and the MP for Halifax</p> <p>There have been numerous studies showing the harmful effects of the incinerator if it were to be used.</p> <p>I object most strongly to the application.</p> <p>XXXXX</p>
195	<p><b>OBJECTION</b></p> <p>I object to the application made by Calder Valley Skip Hire for an Environmental Permit, to operate a waste incineration plant at their Belmont Site in Sowerby Bridge.</p> <p>A previous application for the same site and same incinerator was on 5th August 2023 refused by Government Planning Inspector, John Woolcock.</p> <p>My objection is based on the fact that Sowerby Bridge is already suffering from pollution. It is in an Air Quality Management Area and is only 670 metres downwind of the incinerator. Smoke and mist regularly lie in the valley bottom and inversion can stop waste gasses dispersing as shown by photographs of the aftermath of fires in the valley. This throws considerable doubt on the validity of the air quality models presented by CVSH.</p>

I am a resident of Sowerby Bridge, I say 'NO' to waste incineration in Ryburn Valley.  
XXXXX

196

Hello,

I would like to object to the Sowerby Bridge incinerator. I am a local resident.  
When they first installed the incinerator and tested it, the valley bottom filled with smoke.

It's also in a beauty spot with a footpath running past it. This will ruin this.  
The site has evolved from a small depot surrounded by woodland into a large waste disposal premises.

It's in the wrong location. I have children growing up here and don't want an additional 10,000 tonnes of waste being pumped into their environment each year. They have a right to clean air.

Regards,

XXXXX

197	<p>I wish to object to Calder Valley Skip Hire re-application for an environmental permit to operate a waste incinerator in Sowerby Bridge.</p> <p>Their resubmission of application dated 5th August 2020 was refused at appeal on 5th July 2023 and they did not make an appeal on the inspectors decision. I strongly object to an incinerator pumping out waste gases in the valley, with no safeguard to human health or the environment. The ADMS computer model does not use local weather data and the flow of waste gases cannot be accurately predicted by the computer simulation. Smoke and mist are regular occurrences already in the valley giving poor air quality and the incinerator would further add to this.</p> <p>The new application does not provide adequate inspection rules as they have taken out the part that CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time therefore significantly removing the council's ability to monitor compliance of the operation of the incinerator.</p> <p>Kind regards XXXXX</p>
198	<p>Hi,</p> <p>Just to register my objections to the above application on the grounds of environmental health for local residents. In addition, Calder Valley Skip has already encroached enough in that area.</p> <p>My postal address is: XXXXX</p> <p>Kind regards,  XXXXX</p>

199	<p>We are writing to object to the application for environmental permit to operate a small waste incinerator at Belmont site in Sowerby Bridge S13/006"</p> <p>We object because it is not in line with the clean Air Act and not environment conducive to the valley and surrounding area. The Air quality figures or finding were taken from Yeaden Air port and not a similar location to the proposed area, therefore not acceptable.</p> <p>Previous burning from CVSH in the past have looked like fog in the valley and on a calm day will linger in the valley for hours. On windy days the smoke would release obnoxious odours, pollutants and could be smelt in the air at an unacceptable level.</p> <p>We were under the impression the government Clean Air Act of 1956 was to reduce pollution in populated areas not to encourage and accept it in the name off profit for individuals.</p> <p>yours sincerely XXXXX</p>
200	<p>I object to CVSH wanting an incinerator in Sowerby Bridge.</p> <p>I SAY NO TO WASTE INCINERATOR IN RYBURN VALLEY</p> <p>I live in XXXXX and don't want smog, pollution along with disgusting smells which will linger in the valley and drift up and over the hill sides.</p> <p>The chimney will be unsightly in this lovely green valley which we all live in.</p> <p>Regards XXXXX</p>



201 I am very much against the resubmission of the application and would like to register my objections.

We live in a valley and I do not believe the environmental modelling that has been put forward is correct for our wooded valley .

I have worked in the oil and chemical sector throughout my career and can tell you that we would never have tried to push through something that is quite clearly a health safety and environmental risk to all of us who live in the valley, especially our children.

Regards  
XXXXX

202 Dear Sir or Madam

I would like to object to the application for an Environmental Permit, made by Calder Valley Skip Hire, to operate the proposed incinerator on Rochdale Road in Sowerby Bridge.

Building an incinerator in an effort to deal with waste is both short-sighted and deleterious to the health of the citizens of Sowerby Bridge and the surrounding environment. As a resident of Sowerby Bridge I am opposed to such a construction on the grounds of the aforementioned impacts.

I am also surprised and dismayed at finding that this application has been resubmitted - as it was my understanding that it had previously been considered and rejected. Is the new proposal significantly different from the first? Is this some form of clean burning incinerator that does not generate fumes?

Reconsidering an already rejected proposal for an environmental hazard would appear to be a waste of local government time and resources. If any re-application is made following this one, please consider my strenuous objection to continue in perpetuity for such an incinerator.

Thank you,

XXXXX

203

Good afternoon,

I email to object to the above application which has already been refused at appeal and resubmitted with the option for Calderdale to have sight of inspection records at any time they choose.

Considering how CVSH has operated historically, removing the ability to check compliance seems foolish.

Sowerby Bridge already suffers from air pollution and is an air management area.

A simple drive around on an autumn morning shows clearly how fog and mist hang low in the valley bottom and cloud inversion is common.

We have witnessed many occasions in this valley where smoke from fires does not disperse in the above conditions; it would therefore seem reasonable that the same will be true of waste gasses from the incinerator which will be polluting our air 24 hours a day.

The air quality models presented are therefore questionable as they do not take account of the above or use local weather data; the computer simulation can therefore not accurately predict how waste gases from CVSH operation will be dispersed, or not.

The Government Inspector for the appeal noted that he was:

"unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment."

I doubt very much if this has magically changed since 5/7/23 and I feel far more reassured of his findings and decision than I would that of Council Officers, who with the best will in the world, are neither expert nor suitably qualified to make such decisions.

This entire process has made a mockery of the appeal process and I am astonished that this falls to Officers instead of elected representatives.

In conclusion, I expect Calderdale Council to safeguard the health of myself and my community and that of the local environment and therefore object strongly to this application.

Kind regards,

XXXXX

204

Dear sir/madam,

I was dismayed that Calderdale council might grant an environmental permit to CVSH.

My children already suffer from early symptoms of Asthma and I believe that this is brought about by traffic in the valley which at peak times floods the valley. It is my view that additional emissions from an incinerator will exacerbate the condition that already exists. The environmental modelling uses a system that does not take account of inversions and foliage in the trees in the valley.

It would be foolish to go ahead with such an installation. People in our valley have genuine concerns about the health of their families which should not be ignored.

Kind regards

XXXXX

205

Dear Sir/Madam,

Please register my name in opposition of the proposed incinerator for Sowerby Bridge. I object to this in the main because I do not feel that it has been proved that waste gasses will be safely discharged and therefore it will be a public health hazard for residents of the local area and also will diminish Calderdale's clean air aims.

With each submission of the application inspection and monitoring of compliance with environmental laws is reduced and if this incinerator is allowed Sowerby Bridge's pollution will increase without a doubt.

I feel strongly that most of what is incinerated should be recycled and Calderdale Council and private businesses should be supporting that aim rather than releasing more waste gases and increasing climate change.

Kind Regards

XXXXX

Instagram

Website

206	<p>I wish to register my objection to the application by Calderdale Valley Skip Hire (CVSH) to operate an incinerator at the Belmont, Sowerby Bridge site.</p> <p>This application is a resubmission of an application dated 5th August 2020 which was refused at appeal on 5th July 2023 by a Government Planning Inspector, John Woolcock. John Woolcock was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment"</p> <p>That should surely have been an end to the matter but It seems that CVSH will not take no for answer. I trust that Calderdale Council will uphold the refusal by a Government Planning Inspector.</p> <p>XXXXX</p>
207	<p>Dear Calderdale council,</p> <p>For goodness sake throw this proposal out. As a resident of Sowerby village with children and elderly friends and having worked in a local school, the last thing we need in a closed in valley is more polution on top of the damage being done by increasing stagnant traffic.</p> <p>Other incinerators in the wider district are on the hills away from large populations.</p> <p>Put this to rest and let the Ryburn Valley breathe. I strongly Object.</p> <p>Sincerely, XXXXX</p>

208 Dear CMBC,

I am writing to object to this permit being issued to Calder Valley Skip Hire. I personally objected to their planning application to install an incinerator at this site and was saddened and concerned when it was granted. I was glad when they were not permitted an environmental permit and am horrified that they are allowed to apply again so soon.

I do not see that anything has changed since their last application.

1. The company has no better record of maintaining the conditions set at their other site and the fact that the environment agency is too overwhelmed to check regularly is not a reason to ignore their flouting of the rules.
2. Calderdale MBC does not have the resources to oversee this site to ensure conditions are met.
3. The site is still at the bottom of a steep sided valley which regularly sees inversions and the height of their smoke stack will not prevent the smoke from gathering in the valley. The valley is still an area of poor air quality and this will only make matters worse.
4. The site is not easily accessible for large traffic and will only make the roads in and around Sowerby Bridge worse. Causing problems for motorists and increasing the poor quality of the air.
5. The site is next to a nature reserve and we should not be encouraging the contamination of the reserve.
6. The site will disperse its smoke directly towards a junior school which is questionably wrong.

This site is not wanted by the local community, not because we are being "nimby" but because it is in the wrong location and will potentially permanently damage our children and cause health issues for others. If the company could find a better site I would support them.

XXXXX

209 NO NO NO awe do not want it in the geographical position proposed.  
What part of NO do the numpties not understand . Have they not been Told many times XXXXX

Sent from my iPad

210

I am writing to express my objection to the proposed construction and operation of a waste incinerator on Rochdale Road in Sowerby Bridge as outlined in planning application S13/006. As a concerned resident, my opposition is based on several key points that I believe are critical to the welfare of our community and the environment.

Firstly, the location of the proposed incinerator is already an area suffering from pollution, as highlighted by Clean Air Calderdale. Adding an incinerator to this region would exacerbate air quality issues, negatively affecting the health and quality of life for residents. The area is within a 670-metre downwind range of the incinerator, and the potential for waste bottom ash inversion is a serious risk that cannot be overlooked.

Secondly, the Government Inspector previously found that the waste gases from the incinerator would be discharged in a manner that could not be safeguarded in a controlled way. Introducing such a risk into a community, where the safeguarding of human health and the environment is uncertain, is unacceptable.

Additionally, the ADMS computer model's inability to accurately predict waste gas dispersion due to local weather data irregularities means there is an inherent uncertainty in the proposed operation's impact assessment. Without reliable and precise modelling, it is irresponsible to proceed with a project that could have unforeseen detrimental impacts on our environment.

The community of Sowerby Bridge values clean air and a healthy environment, not just for ourselves but for the generations to come. It is our responsibility to protect our natural resources and uphold the quality of our surroundings. I trust the Council will take into account these points, along with the widespread community opposition, and refuse to grant the Environmental Permit for this incinerator. Please prioritise the health and well-being of Calderdale residents and the ecological integrity of our area.

Thank you for considering my objection. I look forward to your response affirming that this proposal has been declined.

Sincerely,  
XXXXX

211 Dear Sirs

I write to express my objection in the strongest possible terms to the incineration of waste in Ryburn Valley, Sowerby Bridge.

Research suggests that overall there's a complete lack of consistent evidence to conclude on the health effects of incineration, and there HAVE been links in the past to some cancers, cardiovascular diseases, skin diseases and respiratory diseases.

WE DO NOT WANT THIS ESPECIALLY IN SUCH A HUGELY POULATED AREA!!!

PROVE TO ME WITHOUT DOUBT THERE IS NO THREAT TO PUBLIC HEALTH.

Also, what about the increase to traffic in the area? the extra pollution, accident risk, traffic build up when the motorway gets closed because of accidents????

NO NO NO NO NO NO NO

Kindest regards

XXXXX

212 I wish to object to the issuing of an Environmental Permit for an incinerator in Sowerby Bridge. Weather modelling has not been conducted locally enough by an independent authority to demonstrate the possibility of additional pollution to our town in the bottom of the Calder valley.

Best regards

XXXXX



213	<p>Dear Sir or Madam</p> <p>I am writing to object to the application for an Environmental Permit for the incinerator on Rochdale Road, Sowerby Bridge.</p> <p>I agree with Government Planning Inspector, John Woodcock when he said that given the height and proximity of the smoke stack to the trees and woodland, the waste gases could not be controlled in such a way as to safeguard human health and the environment.</p> <p>Th Ryburn Valley, with its inversion fog, is not suitable for an incinerator, with gases and noise trapped there alongside the fumes from the already extremely busy road and bottleneck in Sowerby Bridge.</p> <p>I also feel Calderdale should be recycling more rubbish or using spare capacity in nearby authorities.</p> <p>I would be grateful if you inform me when my objection has been considered.</p> <p>Yours faithfully XXXXX</p>
214	<p>I am writing to object once again to the Sowerby Bridge Incinerator.</p> <p>I object on the grounds of a danger to health and wellbeing to adults and children alike living in the proximity of the site including myself and my family.</p> <p>We pay a premium to live in this part of the valley, it being semi rural and full of wildlife and the incinerator will have a detrimental impact on both nature and our house price in future if passed.</p> <p>There are numerous residents including a number of schools in close proximity and it is disgusting that this company has been allowed to put in these plans again and again. They do not care for the livelihood of our community only money making.</p> <p>We already suffer from high rates of pollution and mist and fog hangs low in the valley. We do not need extra levels to add to this.</p> <p>Please hear our plea,</p>

XXXXX

215

Hi

I am formally objecting to the proposed plans for an incinerator in Sowerby Bridge.

The town is suffering from too much pollution already and to have the threat of this adding to the town seems absurd.

The impact to local residents, schools and welfare of the local population would be great and I ask for common sense to prevail and stop the plans for an incinerator once and for all.

Regards

XXXXX - local resident.

216

Dear XXXXX, I am writing to voice my strongly held objection to the vexatious behaviour of Calder Valley Skip Hire, in re-submitting an application for a new permit to poison the air quality in Sowerby Bridge and the Ryburn valley.

Incineration produces carcinogens and micro- particles and the geography of the area will mean there are many occasions when inversion in the valley means these will linger and not be dispersed.

I am sure your own Public Health colleagues do not want any more pollution in the air, reducing air quality and especially affecting those with breathing difficulties. Do you want to add to the number of people who have to use inhalers, stay indoors when air quality is poor and have a reduced quality of life as a result?

I do not live in Sowerby Bridge but I do spend many hours there doing conservation activities particularly at Milner Royd Community orchard which is downwind and very close to the site of the incinerator. The council encouraged the planting of this orchard in the "Calder Greening Project", to attract the community with healthy food and see how fruit is grown. How can we ensure that it is free from toxins when it is so close to this site? Would you be happy eating an apple grown here if there is any risk of it being coated with residue from the plume?

This community has already expressed its legitimate fears for further reduction in air quality in the valley. Indeed the council library service gave out air quality monitors to highlight where the air quality in the area was already poor. How can the council possibly entertain an application that has already been rejected by the community, and the subsequent appeal where the permit was quashed?

May I remind you that John Woolcock concluded he could not find that granting an environmental permit to operate the plant would not have an adverse effect on human health.

Medical professionals work on the basis of "First do no harm"... so if you cannot ensure the plant does not have an adverse effect on human health... you should not allow the permit!

I deplore the fact that the council has not immediately rejected the application coming so close after it being thrown out on judicial review.

Calderdale Council has "kindness" as one of its key values. Do you think it is kind to even entertain the idea that this company should once again try for a new permit. Is it fair to force the community to repeat their strong objections time and time again?

As a rates payer I deplore the fact that you are having to engage an expensive specialist which will take away money from your budgets for what has already been determined as being potentially unsafe for your residents. This is throwing good money after bad! I urge you not to entertain any application from this company until they can categorically prove beyond any reasonable doubt that there will be no adverse effect on air quality and people's health.

Yours sincerely

XXXXX

Sent from Mail for Windows

217	<p>To whom it may concern, our household objects to the incineration of waste at Rochdale road caldervalley skip hire.</p> <p>Many thanks XXXXX</p>
218	<p>Dear sir</p> <p>I would like to put forward my rejection for the planning of the incinerator at Sowerby bridge. I am not happy with the consultation process, I am not happy with the damage that this may cause to the beautiful green valley it would reside in. Please not this as a rejection to this planning.</p> <p>Kind regards</p> <p>XXXXX</p>
219	<p>To Whom it May Concern</p> <p>I object to the proposed incinerator in Sowerby Bridge by Calder Valley skip hire as I am concerned about how it will affect the air quality and the local environment in general.</p> <p>Yours</p> <p>XXXXX</p>

220 I am writing to make my objections to the above application.

The Calder valley is prone to temperature inversions. The additional pollution created by this unnecessary and reckless scheme would be trapped in our valley. Leading to significantly increased risks to the health of our local population.

The traffic into and out of the site will create an additional burden on our overcrowded roads and also add to the emissions generated, at a time when most residents of calderdale are trying to reduce the same.

Where is the gain for calderdale, in having this noxious polluter sending tons of poisonous emissions directly into our confined atmosphere ?

It must not be allowed to proceed.

Regards

XXXXX

221 I am emailing to say no to the incinerator!!!

XXXXX

Many thanks

XXXXX

222A Hello,

I am writing to voice my objections to the proposed incinerator at CVSH.

I oppose this due to pollution and health concerns, as per John Woolcock inspection.

Thank you

Sent from my iPhone

222B To whom it may concern,

I am writing to express my strong objection to the proposed incinerator project in Sowerby Bridge, particularly in light of recent findings from the government inspector regarding its potential impact on air quality and public health. As a resident with a young family in XXXXX, I am deeply concerned about the detrimental effects this incinerator could have on our community's well-being and environment.

The fact that Sowerby Bridge is already designated as an air quality management area underscores the urgency and importance of addressing any potential sources of pollution. The proposed incinerator raises significant alarm bells, especially considering the remarks made by the government inspector regarding the inability to ensure that waste gases would be discharged in a controlled manner to safeguard human health and the environment.

The statement from the government inspector, indicating an inability to guarantee the safe discharge of waste gases, is deeply troubling. It suggests a serious risk to the health and safety of residents, particularly vulnerable groups such as children, the elderly, and individuals with pre-existing health conditions. As a parent of young children, this is incredibly concerning to me, as I am sure it is to many other families in our community.

Moreover, the potential negative impacts of the incinerator extend beyond immediate health concerns. Air pollution can have far-reaching consequences, including environmental degradation, ecosystem disruption, and exacerbation of climate change. Given the pressing need to address these issues, approving a project with such uncertain and potentially harmful implications would be irresponsible and short-sighted.

I urge you to consider the long-term well-being of Sowerby Bridge residents and the environment by rejecting the proposed incinerator project. Instead, I implore decision-makers to explore alternative waste management solutions that prioritise public health, environmental sustainability, and community resilience.

Thank you for taking the time to consider my objections. I hope that you will give careful consideration to the concerns raised by myself and other residents regarding the proposed incinerator.

Sincerely,

XXXXX



223 Dear Council  
Please register my objection to Calder Valley skip hires application to have an incinerator.  
Why is this planning application going ahead s add gain when the government inspector declined it in 2020?  
I am co ver Ed about air quality and having an incinerator in a valley with residents close by Yours sincerely XXXXX  
  
Sent from my iPhone

224 To whom it may concern,  
  
I am writing to object and share my feelings of absolute disgust that the owner of CVSH can even attempt to push plans for the incinerator through again.  
  
The last attempt failed through proper evidence that the incinerator will bring health issues to yhe valley.  
  
Each day you hear about clean air, with Calderdale Council driving around in electric vehicles to help with this so why would this even be considered again?  
  
I sincerely hope that whoever is making the decision makes the correct one for all local residents and blunty tells CVSH that this cannot happen.  
  
Please dont let us down Calderdale Council, simply refuse and put this to bed once and for all.  
  
Regards  
  
XXXXX Father of 2 children, XXXXX and XXXXX years old, who would feel the health implications of this!!!

225 Dear Sir/Madam,

I am writing to express my objection to the proposal to operate an incinerator on Rochdale Road in Sowerby Bridge.

A government planning inspector has already refused this application on the grounds that he was unable to find that the incinerator could operate without risk to human health or the environment.

Air quality in Sowerby Bridge is already a concern for me due to the high volume of traffic, and the nature of the valley stops waste gases escaping.

I live close to the site and have 2 small children who attend school and nursery nearby. I am keen for my children to walk to school and play outdoors without risk to their health - it should be a basic human right for our children to breathe clean air.

I trust the council to do the right thing for our community and environment - reject this application.

Yours Sincerely.  
XXXXX

226

Hello.

I am writing to you to formally lodge my objection against the building of a waste incinerator in sowerby bridge. I strongly feel that we all have the right to breathe clean air and that as the plans have already been shown to be unsafe that it is outrageous that the council has allowed this company to reapply for the same plan.

Yours sincerely  
XXXXX

227 I strongly object to the incineration of toxic waste in Sowerby Bridge.

It will severely impact the health of every one of us in the town and surrounding towns. Sowerby Bridge is already suffering from pollution and is in an AIR QUALITY MANAGEMENT AREA.

This will kill off our wildlife, pollute our waterways and add to the growing lists of ailments many in the area already suffer (cancer, lung and nasal problems, breathing difficulties such as asthma).

This project needs to be shelved to protect us all, the consequences of going ahead will potentially be devastating.

Sent using the mail.com mail app

228 Please take this as my objection to the Sowerby Bridge incinerator.

XXXXX

229 Good morning

I am disgusted to see that once again the council and government are even entertaining another application of any sort. The whole community is against this plan and have voiced their objections many times before.

The planning system just seems to be a war of attrition. If you have enough time and money to waste on applying enough you will finally get your own way.

The location and suitability is completely wrong. The site already is an eyesore in the valley. There is nothing wrong with waste management and recycling but incineration in a beautiful valley is not acceptable. We surely have learned that lesson years ago that burning waste is not good for the environment.

I hope the council and those included on the decision take all the necessary steps to prevent this application from being reapplied and we no longer have to say the same things to help look after our environment and children's future.

Thank you for your time.

XXXXX

Tel: XXXXX

230

I object!

The planing permission had been thrown out, reapplied for and thrown out by the environmental office in government. I do not understand how they are able to be applying again.

I object on the ground of not only health but environmental we live in an inverted V shape meaning that all the debris and debris and smog that is going to be released from that chimney is going to come straight down into the valley bottom affecting all the people that live here, affecting all the schools and children that growing up here.

There is nowhere in the UK that is simile to Calderdale for its unique valleys hence no model we can compare it against for environmental or human health damage. Previous the pollution and environment factors have been compare against compare that of airport at Leeds Bradford is not acceptable. Leeds Bradford is on the top of the hill and not situated right in the middle of a residential area.

Councils are not even going to vote on this matter it has been reported during a public meeting, one that the council did not attend to explain anything.

I am objecting and this permit should NOT be allowed it be applied for again.

XXXXX

231

I strongly object to the application for the proposed incinerator being made by Calder Valley Skip Hire.

I have lived up XXXXX for over XXXXX years and in recent years we can smell the nasty smell coming from the waste/burning in our garden. On some days we can smell this in the house if the windows are open.

This will be detrimental to the whole valley, the smell, safety, air pollution and no doubt increased traffic being a number factors to be affected.

This application was originally made in August 2020 and refused at appeal by a Government Inspector in July 2023.

If a qualified inspector can refuse this application, see his report for his stated reasons, and the Council are REFUSING to vote, how can the decision of Council Officers be acceptable.?

XXXXX

232 I officially object to having an incinerator in Sowerby Bridge

My husband has chronic asthma and my grandchild regularly comes to play. You will destroy our air quality

Kind regards

XXXXX

Resident

Sent from Outlook for iOS

233 This permit is not in the best interests of the community and therefore object again to the request to develop an incineration plant at Belmont.

The harm that this would cause to residents and the environment is significant.

I hope that this will not be considered.

XXXXX

Sent from my mobile device

Apologies for any typos

234

Hello

I would like to object about the application to install an incinerator in Sowerby Bridge .  
It will create air pollution ,noise and a negative affect to the environment in the Ryburn Valley.  
Please listen to the people of the lovely area we all live in before its too late !

Kind Regards

XXXXX

Sent from my iPhone

235

Dear sir,

I strongly object to the possible granting of an environmental permit being granted to Calder Valley Skip Hire, to operate a 24/7 waste incinerator.

The application calderdale planning S13/006 should not be granted for many reasons. It is a resubmission of the 5/8/2020 application which was refused at appeal 5/7/23 by John Woolcock Government Planning Inspector.

All the reasons for that refusal still stand.

As a resident of Sowerby Bridge I am extremely concerned for the health of my family. Waste any gases from the incinerator running continuously would put the health of the whole valley in jeopardy.

The situation of the incinerator deep in the valley bottom together with local inversion weather conditions is very troubling. I do not understand why the original objection have not been included in this latest application. I am truly shock that the concil is reconsidering. The council would not be safeguarding our health or that of the enviroment. Sowerby Bridge is already suffering from pollution. Have such a facility metres away would further reduce the air quality. We are in a air quality management area. Breathing clear air should be our communities right. Not making it worst.

Please seriously consider my objections and refuse the application.

Regards

XXXXX

236 To whoever it may concern

I would like to voice my objection to the planned incinerator in Sowerby Bridge.

Thank you

237 Dear sirs,

I am writing to express my strong objection to the proposed incinerator project in Sowerby Bridge, particularly in light of recent findings from the government inspector regarding its potential impact on air quality and public health. As a resident with a young family in Sowerby Bridge, I am deeply concerned about the detrimental effects this incinerator could have on our community's well-being and environment.

The fact that Sowerby Bridge is already designated as an air quality management area underscores the urgency and importance of addressing any potential sources of pollution. The proposed incinerator raises significant alarm bells, especially considering the remarks made by the government inspector regarding the inability to ensure that waste gases would be discharged in a controlled manner to safeguard human health and the environment.

The statement from the government inspector, indicating an inability to guarantee the safe discharge of waste gases, is deeply troubling. It suggests a serious risk to the health and safety of residents, particularly vulnerable groups such as children, the elderly, and individuals with pre-existing health conditions. As a parent of young children, this is incredibly concerning to me, as I am sure it is to many other families in our community.

Moreover, the potential negative impacts of the incinerator extend beyond immediate health concerns. Air pollution can have far-reaching consequences, including environmental degradation, ecosystem disruption, and exacerbation of climate change. Given the pressing need to address these issues, approving a project with such uncertain and potentially harmful implications would be irresponsible and short-sighted.

I urge you to consider the long-term well-being of Sowerby Bridge residents and the environment by rejecting the proposed incinerator project. Instead, I implore decision-makers to explore alternative waste management solutions that prioritise public health, environmental sustainability, and community resilience.

Thank you for taking the time to consider my objections. I hope that you will give careful consideration to the concerns raised by myself and other residents regarding the proposed incinerator.

Sincerely, XXXXX

238

Dear sirs,

I am writing to express my strong objection to the proposed incinerator project in Sowerby Bridge, particularly in light of recent findings from the government inspector regarding its potential impact on air quality and public health. As a resident with a young family in the Calder Valley, I am deeply concerned about the detrimental effects this incinerator could have on our community's well-being and environment.

The fact that Sowerby Bridge is already designated as an air quality management area underscores the urgency and importance of addressing any potential sources of pollution. The proposed incinerator raises significant alarm bells, especially considering the findings of the government inspector regarding the inability to ensure that waste gases would be discharged in a controlled manner to safeguard human health and the environment.

The statement from the government inspector, indicating an inability to guarantee the safe discharge of waste gases, is deeply troubling. It suggests a serious risk to the health of residents, particularly vulnerable groups such as children, the elderly, and individuals with pre-existing health conditions. As a parent of young children (4 & 1), this is incredibly concerning to me, as I am sure it is to many other families in our community.

Moreover, the potential negative impacts of the incinerator extend beyond immediate health concerns. Air pollution can have far-reaching consequences, including environmental degradation, ecosystem disruption, and exacerbation of climate change. Given the pressing need to address these issues, approving a project with such uncertain and potentially harmful implications would be both irresponsible and short-sighted.

I would urge you to consider the long-term well-being of the residents and the environment of the Calder Valley by rejecting the proposed incinerator project. I also implore you to charge decision-makers to explore alternative waste management solutions that prioritise public health, environmental sustainability, and community resilience.

Thank you for taking the time to consider my objections. I hope that you will give careful consideration to the concerns raised by myself and other residents regarding the proposed incinerator.

Many thanks

XXXXX



239 I strongly object to the application for the proposed incinerator being made by Calder Valley Skip Hire.

I have lived up Sowerby New Road for over 40 years and in recent years we can smell the nasty smell coming from the waste/burning from the incinerator in our garden. On some days we can smell this in the house if the windows are open.

This will be detrimental to the whole valley, the smell, safety, air pollution and no doubt increased traffic being a number factors to be affected.

This application was originally made in August 2020 and refused at appeal by a Government Inspector in July 2023. If a qualified inspector can refuse this application, see his report for his stated reasons, and the Council are REFUSING to vote, how can the decision of Council Officers be acceptable.?

XXXXX

To whom it may concern,

I am writing to express my strong objection to the proposed incinerator project in Sowerby Bridge, particularly in light of recent findings from the government inspector regarding its potential impact on air quality and public health. As a resident with a young family in Sowerby Bridge, I am deeply concerned about the detrimental effects this incinerator could have on our community's well-being and environment.

The fact that Sowerby Bridge is already designated as an air quality management area underscores the urgency and importance of addressing any potential sources of pollution. The proposed incinerator raises significant alarm bells, especially considering the remarks made by the government inspector regarding the inability to ensure that waste gases would be discharged in a controlled manner to safeguard human health and the environment.

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I urge you to consider the long-term well-being of Sowerby Bridge residents and the environment by rejecting the proposed incinerator project. Instead, I implore decision-makers to explore alternative waste management solutions that prioritise public health, environmental sustainability, and community resilience.

Thank you for taking the time to consider my objections. I hope that you will give careful consideration to the concerns raised by myself and other residents regarding the proposed incinerator.

Sincerely,  
XXXXX

Sent from Outlook for Android

241 Dear Calderdale Council Officers

I refer to the above application and would like to register my objection to this planning application.

Putting an incinerator on a valley is, in my opinion, a bad idea. Smoke and smog will collect in the valley on calm days and this will not be good for air quality in the area.

Please refuse this application and suggest they build the incinerator on the top of a hill, instead of on a valley bottom.

Thank you for your time

Regards

XXXXX

242

XXXXX

Dear Sir/Madam,

I live close to the proposed site and as a father of 2 young children who attend school and nursery nearby I am concerned by this new application.

I am writing to formally express my objection to the construction of a waste incinerator on Rochdale Road, Sowerby Bridge. As a resident of this community, I strongly believe that this proposed facility poses significant health, environmental, and quality of life concerns for our town.

First and foremost, the potential air pollution generated by the incinerator poses a serious threat to the health and well-being of local residents. Studies have shown that incinerators emit harmful toxins and particulate matter into the air, which can lead to respiratory problems, cardiovascular diseases, and other serious health issues. Traffic and noise are already a problem in Sowerby Bridge both of which would be further increased along with pollution associated with the facility which would have a detrimental impact on our community.

Furthermore, the proximity of the incinerator to residential areas raises concerns about property values and the overall desirability of living in Sowerby Bridge. The presence of such a facility could deter potential homebuyers and businesses from investing in our town, ultimately harming our local economy and community development.

I urge Calderdale Council to object to the planning application of the waste incinerator project and explore alternative waste management solutions that are more sustainable and environmentally friendly. It is crucial that the well-being and best interests of the residents are prioritised in any decision-making process regarding the future of our town.

Thank you for considering my objections to the waste incinerator construction. I trust that the Council will take into account the concerns of the community and act in the best interest of Sowerby Bridge and its residents.

Sincerely,

XXXXX

243 Dear Calderdale Council Officers

I refer to the above application and would like to register my objection to this planning application.

Putting an incinerator on a valley is, in my opinion, not a good idea. Smoke and smog will collect in the valley on calm days and this will not be good for air quality in the area.

Please refuse this application and suggest they build the incinerator on the top of a hill, instead of on a valley bottom.

Thank you for your time.

Regards

XXXXX

244 Good morning

I wish to voice my objection in relation to the council allowing CVSH the possibility for them to submit yet another application for an incinerator on the Belmont Site. Local residents have opposed this once and now feel back to square one.

Surely, this is not even a consideration given that health will suffer and house prices could be affected. Ryburn Valley is a pleasant, happy place to live but if this is granted I fear the area will become a stay clear zone .

Please put this to bed once and for all and do not allow our valley to be spoiled .

Regards - Resident of XXXXX

245 Good Morning,

I am writing to make it known that I absolutely object to the proposed incinerator in Sowerby bridge. I am shocked and appalled that this is still trying to go ahead despite numerous rejections and the opinion of the local residents.

I don't think I need to say anything but to reiterate the governments findings "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment." For this to go ahead it would be a crime to the people and the local landscape to which myself and all the local residents are very fond of.

Should it go ahead I believe a lot of people will no longer visit our town or wish to live here. I will definitely be one of them.

Regards

XXXXX

246 I wish to object to the above permit application.

The application is almost a cut and paste of the earlier application S13/005 from 2020 which was refused by the government inspector. The applicant has made no changes to the design or construction of the incinerator that would address the inspector's concerns. The applicant says that they have appointed an independent review of the treatment of trees in the air quality assessment (item 1.5.6). The reviewer was Cambridge Environmental Research Consultants, but within 1.5.6 it states that CERC developed and maintain the ADMS modelling software. How can that be classed as independent?

I remain unconvinced that the incinerator would not present a danger to the health of the people of Sowerby Bridge and the surrounding area and ask that CMBC refuse to issue a permit.

XXXXX

247

Good Morning,

I write to object to the SWIP at Belmont Industrial Estate in Sowerby Bridge.

I am a local resident just 600m away from the plant who is very concerned about the health and environmental impact that the plant will cause local residents and the beautiful surrounding nature.

The proposed plant is far to close to nearby trees and beautiful woodland containing so much wildlife. It is also within a valley meaning the exhaust will reach the majority of houses in the local area that are on higher land. All of the inhabitants will suffer the impact of this awful exhaust, the site is just not fit for this kind of installation.

On days where the wind is high and blowing in a certain direction the local town will be covered in exhaust which will impact the local economy. Who will want to go for a walk or sit out for a coffee in the area when this is happening? The smell will be abhorrent with the proposed waste that will be burnt, awful construction waste full of god knows what.

For the sake of human and environmental health for generations to come please do not approve the license to use the SWIP at CVSH.

XXXXX

248

Please accept this as a formal objection to the proposed incinerator at Sowerby Bridge , reasons sited below

i) Due to potential harm to public health and environment from waste gasses which would be permitted to be discharged in Sowerby Bridge valley bottom Monday to Friday, 24hours a day, 52 weeks per year as the Incinerator has applied to burn 2 tonnes per hour of industrial waste.

ii) Effect on AIR QUALITY Improvement Area in Sowerby Bridge which is 670 metres from exhaust stack

iii) Effect on traffic congestion on AIR QUALITY Improvement Area in Sowerby Bridge by extra lorries to and from the site 670 metres from Sowerby Bridge transporting 2 tonnes of industrial waste Monday to Friday, 24hours a day , 52 weeks per year.

XXXXX



249	<p>I would like to register my objection to the proposed incinerator in Sowerby Bridge. The Government Inspector has already stated that this is not a suitable site and as no evidence to the contrary has been presented the refusal of this application should remain</p> <p>XXXXX</p>
250	<p>Hello,</p> <p>Please register my objection to the proposed incinerator at Sowerby Bridge.</p> <p>1) Due to potential harm to public health and environment from waste gasses which would be permitted to be discharged in Sowerby Bridge valley bottom Monday to Friday, 24hours a day, 52 weeks per year as the Incinerator has applied to burn 2 tonnes per hour of industrial waste. There has been no satisfactory modelling to prove exhausted gasses and particulate matter will not have a detrimental impact on the environment and residents of the area.</p> <p>2) The Effect on AIR QUALITY Improvement Area in Sowerby Bridge which is 670 metres from exhaust stack.</p> <p>3) Effect on traffic congestion in Sowerby Bridge by way of extra lorries to and from the site 670 metres from Sowerby Bridge transporting 2 tonnes of industrial waste Monday to Friday, 24hours a day , 52 weeks per year.</p> <p>Thank you for your help with my objection.</p> <p>Sent from my iPhone</p>

251A

Good Morning,  
Calderdale Planning S13/006

I am writing to strongly object to Calder Valley skip Hire's proposed Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

The location of the proposed incinerator is not suitable. As stated by John Woolcock (a government planning inspector), on his inspection of the site, given the height and proximity of the smoke stack to trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment."

In addition to the above I am concerned about the impact the proposed incinerator would have to local residents. This is for the following reasons:-

As is widely known incinerators emit particles. The Committee on the Medical Effects of Air Pollutants (COMEAP) has published a series of statements and reports on the effects of air pollutants on health in the UK. It is accepted that exposure to current levels of common air pollutants damages health. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland seeks to reduce concentrations of air pollutants. Where concentrations of air pollutants are raised, Air Quality Management Areas are defined and plans to reduce concentrations are developed by Local Authorities.

Sowerby Bridge is already in an Air Quality Management Area and this is 670 metres from the proposed incinerator. In addition to greenhouse gas emissions that exacerbate climate change, incinerators emit many toxins and pollutants that harm local air quality. Emissions include dioxins, NOx and ultrafine particulate matter that can be harmful to both human health and the natural environment. Incinerators emit large quantities of CO2, roughly one tonne of CO2 for every tonne incinerated. About half of this CO2 derives from fossil sources such as plastic. For decades incinerators have been releasing harmful greenhouse gas (GHG) emissions without compensating society for the associated harm that this has caused.

Both long-term exposure and short-term increases in exposure to particles can damage health. This is widely accepted (World Health Organization, 2006). Long term exposure affects the risk of mortality, especially from cardiovascular disease and from lung cancer (COMEAP, 2009, COMEAP, 2006; Health Effects Institute, 2000). Short-term increases in concentrations cause cardio- respiratory effects including an increase in deaths from heart attacks and from respiratory disease, increased hospital admissions for treatment of these disorders and increases in related symptoms. No thresholds of effect can be identified for either the effects of long-term exposure or for the effects of short-term increases in concentrations. Thus, any increase in particle concentrations should be assumed to be associated with some effect on health.

One of the most worrying aspects within the application submitted is Calder Valley Skip Hire have removed the council's

ability to monitor compliance in the operation of the incinerator.

As residents of Sowerby bridge we believe that breathing clean air should be a basic right of any community. I am deeply disappointed that Calder Valley Skip Hire continue to submit applications despite numerous application being rejected.

XXXXX

Sent from my iPhone

251B REF: S13/006

I strongly object to Calder Valley skip hire proposed (again) incinerator being built and run at the Belmont Site. As previous proven tests and investigations this proposed site is not fit for purpose.

The impact would seriously damage health and the well-being of all residents and local schools. Sowerby Bridge is already suffering from poor air quality even a resident garden fires smoke will sit in the valley for hours reaching both Sowerby Bridge and Kebroyd. The idea of an incinerator burning 24hrs a day with no right for the council to inspect at any time also being taken out of this proposal is quite frankly freighting as it gives CVS a licence to do whatever they want to hell with the consequences to local people's health,

I am appalled that Calderdale Council is even allowing this appeal/application to take place after the last rejection from the Government/Counsellors and most importantly residents. Sowerby Bridge is not a place to house this dangerous poisonous incinerator and why do CVS have the right to take away the publics basic right to breath clean air.

I would urge you to consider your feelings and worries to an incinerator operating on your doorstep.

XXXXX

252	<p>To whom it may concern  Calderdale MBC, Environmental Health, Town Hall, Crossley Street, Halifax HX1 1UJ  I want to register my objection to the Calder Valley Skip Hires application for an incinerator CVSH Incinerator (Case Ref: CW41517)  It was clear from the public enquiry and ruling on this matter that an incinerator on the site would be extremely harmful to public health and the matter should be closed.  Calderdale council planners should be advising the applicant against another application, as it represents a waste to tax-payers money in processing the application, holding hearings, etc.</p> <p>Given the public enquiry I do not feel it necessary to list all the reasons for objection. I simply refer you to the ruling.</p> <p>On a more general point the Council's primary duty, and by default the duty of it's planning department, is to the health and wellbeing of the communities it serves – not the interests of a private company.</p> <p>XXXXX</p>
253	<p>Hello,</p> <p>This is a formal objection the planned incinerator in Sowerby bridge as a resident.</p> <p>Sowerby Bridge is already busy as it is with traffic without added extra refuse wagons.</p> <p>Not to mention the terrible effects to the air quality in our town, it is completely unacceptable for this to be even considered.</p> <p>Please do the right thing and reject the incinerator.</p> <p>Thanks</p> <p>XXXXXX</p> <p>Sowerby Bridge resident.</p>

254

Good Morning,

Calderdale Planning S13/006

I am writing to strongly object to Calder Valley skip Hire's proposed Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

The location of the proposed incinerator is not suitable. As stated by John Woolcock (a government planning inspector), on his inspection of the site, given the height and proximity of the smoke stack to trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment."

In addition to the above I am concerned about the impact the proposed incinerator would have to local residents. This is for the following reasons:-

As is widely known incinerators emit particles. The Committee on the Medical Effects of Air Pollutants (COMEAP) has published a series of statements and reports on the effects of air pollutants on health in the UK. It is accepted that exposure to current levels of common air pollutants damages health. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland seeks to reduce concentrations of air pollutants. Where concentrations of air pollutants are raised, Air Quality Management Areas are defined and plans to reduce concentrations are developed by Local Authorities.

Sowerby Bridge is already in an Air Quality Management Area and this is 670 metres from the proposed incinerator. In addition to greenhouse gas emissions that exacerbate climate change, incinerators emit many toxins and pollutants that harm local air quality. Emissions include dioxins, NOx and ultrafine particulate matter that can be harmful to both human health and the natural environment. Incinerators emit large quantities of CO<sub>2</sub>, roughly one tonne of CO<sub>2</sub> for every tonne incinerated. About half of this CO<sub>2</sub> derives from fossil sources such as plastic. For decades incinerators have been releasing harmful greenhouse gas (GHG) emissions without compensating society for the associated harm that this has caused.

Both long-term exposure and short-term increases in exposure to particles can damage health. This is widely accepted (World Health Organization, 2006). Long term exposure affects the risk of mortality, especially from cardiovascular

disease and from lung cancer (COMEAP, 2009, COMEAP, 2006; Health Effects Institute, 2000). Short-term increases in concentrations cause cardio- respiratory effects including an increase in deaths from heart attacks and from respiratory disease, increased hospital admissions for treatment of these disorders and increases in related symptoms. No thresholds of effect can be identified for either the effects of long-term exposure or for the effects of short-term increases in concentrations. Thus, any increase in particle concentrations should be assumed to be associated with some effect on health.

One of the most worrying aspects within the application submitted is Calder Valley Skip Hire have removed the council's ability to monitor compliance in the operation of the incinerator.

As residents of Sowerby bridge we believe that breathing clean air should be a basic right of any community. I am deeply disappointed that Calder Valley Skip Hire continue to submit applications despite numerous application being rejected. Sent from my iPhone

255	<p>I am writing to express my strong objection to Calder Valley Skip Hire's application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge. The reasons for the objection are:</p> <ul style="list-style-type: none"> <li>· In July 2023 a Government Planning Inspector refused the application due to concerns about the discharge of waste gases and their risks to the health of local people and the environment.</li> <li>· All elected representatives and MPs have opposed this application, reflecting strong local objections. Breathing clean air is a basic right that should be protected for our community</li> <li>· Polluting gases from the chimney will not be dispersed above the level of the houses along the valley and hillsides but will be in the air breathed by all who live here. There are 9 schools within 1 mile and 18 schools within 2 miles of the chimney. The schools in close proximity are all above the proposed chimney height. A public footpath runs close to the site. Calderdale had the highest rate of respiratory tract infections in West Yorkshire for infants under one year in 2016 &amp; asthma admissions in 2019.</li> <li>· The proposal uses data from the weather station at Leeds Bradford Airport to show that the gases will be dispersed. This is nowhere near the Ryburn Valley and the landform is completely different. The steep-sided Ryburn valley and prevailing winds mean that emissions will frequently blow towards the centre of the local population. In windless conditions, local residents regularly see smoke and mist hanging for long periods in the valley.</li> <li>· There are reasonable doubts as to whether CVSH would operate an incinerator correctly. Already, there have been several fires and there is also a flood risk. CVSH have shown the wrong postcode on the application for a place not at risk of flooding.</li> <li>· It is concerning that the application removes the Council's ability to request site diaries and inspection records to monitor compliance.</li> </ul> <p>Please refuse this application. The risks to our air quality and health are simply too high.</p> <p>XXXXXX</p>
256	<p>We wish to make a very strong objection to the incinerator planned for Sowerby Bridge . My husband and I are both over XXXXX yrs old I have asthma and we think this incinerator will impair the air quality in Norland because of the height of the chimney. We were unable to attend the meeting owing to the fact I am recovering from an operation . I hope our complain will be considered . XXXXX and XXXXX</p> <p>Sent from my iPad</p>



257 To whom it may concern,

I am writing to object to the plans for turning on an incinerator in Sowerby Bridge. Locals have already made a clear case against this, and how it will negatively impact their lives. It is completely unacceptable that the council, which is funded by local tax payers, is permitting a private company to cause such devastating environmental impact on the local area, despite the government stating that it is unsafe and should not be turned on.

My children live in the area and I do want to see them or their future children develop health issues such as asthma or to see their house prices plummet when people realise it is not a good place to live.

From an external standpoint as well, as someone who lives outside the town. Sowerby Bridge already has a very grimy, industrial feel. Many buildings are black from air pollution and there are an inordinate amount of industrial units already pumping out chemicals and pollution. An incinerator will do nothing to improve the image of the town, or increase tourism or footfall within the local shops.

Surely the council would be better placed to clean up the air and invest in making the town more visually appealing, rather than allowing yet another private company to have a negative affect on its image.

Yours in hope,

XXXXX  
Valley Resident

258	<p>Good Afternoon,</p> <p>I'm emailing to object to the SWP at Belmont Industrial Estate in Sowerby Bridge.</p> <p>We live in the community and are worried about the health risks involved with the burning of industrial waste in a highly populated area.</p> <p>I'm disgusted that this has been even considered as i would have thought that the councils priority would be the health and safety of its citizens, if this is allowed to go through Sowerby Bridge will fill with pollution in an already polluted area, we should be acting to reduce the damage to the environment not encourage it.</p> <p>Please reject this licence for the wellbeing of the people of Calderdale as it sets a dangerous precedent as to what is allowed in communities.</p> <p>Thank you, XXXXX</p>
259	I'm trying to find out how to oppose the incinerator in sowerby bridge.
260	<p>Dear Sir/Madam,</p> <p>I would like to register my protest to this re-application for permission to site an incinerator in Sowerby Bridge. This has previously been rejected and there is no reason to approve on appeal.</p> <p>Thank you. XXXXX</p>

261 I am writing to object to the above Planning Application.

I have lived in Calder Valley for over XXXXX years now and love the area's natural beauty. I am appalled that you may even be considering an application for a waste incinerator in the valley. The pollution that would be emitted from the plant, let alone the extra traffic that will be visiting the plant would be extremely detrimental to the local environment. Sowerby Bridge is already suffering from air pollution. It is in an Air Quality Management Area because smoke and mist regularly lie in the valley bottom because of inversion. Having an incinerator to add to the current situation cannot seriously be a consideration.

I strongly urge you to reject this application for once and all. We all deserve to be able to breath clean air.

Yours sincerely

XXXXX

262 Dear Calderdale MBC Environmental Health,

I am writing to express my strong objection to Calder Valley Skip Hire's application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

This is a resubmitted application after their original proposal was rightfully refused at appeal in July 2023 by a Government Planning Inspector due to concerns about the discharge of waste gases and protecting human health and the environment.

Sowerby Bridge is already an Air Quality Management Area suffering from pollution issues. Having the incinerator just 670 meters away with its smoke and emissions regularly blowing into the valley bottom is unacceptable. There are valid doubts about the air quality models presented not accurately accounting for local weather patterns and inversions that can trap pollutants.

Furthermore, it is extremely concerning that the new application has removed the Council's ability to request site diaries and inspection records to monitor compliance. There must be transparency and oversight over operations.

All elected representatives - councilors across parties and MPs - have rightly opposed this application from the start. Breathing clean air is a basic right that should be protected for our community.

I urge you to listen to the residents and reject this incinerator permit application once again. The risks to our air quality and health are simply too high.

Thank you for your consideration.

Kind regards,

XXXXX

263

Dear sir/ madame,

I am writing this email to object to the new application from Calder Valley Skip Hire for the incinerator in Sowerby Bridge. As a local business within Sowerby bridge we are saddened that this subject is being entertained after being rejected once before by an independent inspector.

Some points I would like to make are the following:

1. CVSH have provided data from Leeds/Bradford airport to try prove their waste will clear naturally (However, we live nowhere near the airport, we are a unique valley and nothing like the environment near the airport!)
2. How the air quality will be affected, Sowerby Bridge already has high pollution levels especially with us being so close to the motorway and the regular closures causing more traffic to flow through.
3. The company and shareholders are trying to go above the higher court ruling which shouldn't be allowed in itself.
4. The chimney stops considerably lower than the surrounding trees and hillside, not to mention Norland above.
5. Far too many houses and residents in the immediate areas.

Kind regards  
XXXXX

264A Good Afternoon

I wish to object again to the proposed Incinerator in Sowerby Bridge, for the following reasons. I wish to state that it is remarkable that this has even been re submitted after being refused at appeal.

As we know incinerators emit large quantities of CO2, largely from fossil sources such as plastic, harmful to the planet. Greenhouse gases are released by incinerators therefore the planet again bears the brunt of this pollution.

I am concerned about the health impact on the residents due to toxic air quality, well documented, local to the proposed incinerator and surrounding district.

Additional emissions from this incinerator will add to the already high level of toxins in some people, in particular infants and young children living and going to nursery and school down the valley.

The increased heavy goods traffic on an already very busy trunk road, with poor access to the site should be taken into consideration.

Potential harm to wildlife in the area as well as an unsightly negative environmental impact.

This project does not meet the requirements of the Waste Hierarchy, the incinerator will act as a disincentive to prevent, reuse and recycle.

In the valley.

I strongly OBJECT for all of the above reasons.

XXXXX

264B This objection replaces my previous one sent 26/03/24

Subject: Incinerator Sowerby Bridge licence to operate OBJECTION

Good Afternoon

I wish to object again to the proposed Incinerator operating in Sowerby Bridge, for the following reasons. I wish to state that it is remarkable that this has even been re submitted after being refused at appeal.

As we know incinerators emit large quantities of CO2, largely from fossil sources such as plastic, harmful to the planet. Greenhouse gases are released by incinerators therefore the planet again bears the brunt of this pollution.

I am concerned about the health impact on the residents due to toxic air quality, well documented, local to the proposed incinerator and surrounding district.

Additional emissions from this incinerator will add to the already high level of toxins in some people, in particular infants and young children living and going to nursery and school down the valley.

The increased heavy goods traffic on an already very busy trunk road, with poor access to the site should be taken into consideration.

Potential harm to wildlife in the area as well as an unsightly negative environmental impact.

This project does not meet the requirements of the Waste Hierarchy, the incinerator will act as a disincentive to prevent, reuse and recycle.

In the valley.

I strongly OBJECT for all of the above reasons.

XXXXX

265 To whom it may concern,

My objections to the proposed incinerator in Sowerby Bridge are as follows:

The junction by the HWRC is already busy, with queues of traffic waiting at some times, obstructing the junction , especially at Fall Lane. The road has had to be resurfaced.

Vehicles bringing waste to be incinerated would generate more noise for local residents (Canal rd., Walker Ln, and Chapel Ln).

Incinerators give off toxic gases, particles, heavy metals and Dioxins, increasing air pollution for walkers, runners and cyclists. This will also affect workers at the HXRC site and local businesses.

The canal towpath is a frequently used "Greenway".

This scheme is not safe or healthy for residents, visitors or workers.

sincerely  
XXXXX



Dear Sir/Madam,

I am writing to formally object to the proposed construction of an incinerator in our small but bustling town. As a concerned resident, I believe that this development would have detrimental effects on our community and the environment, especially given it is proposed to run 24 hours a day, 5 days a week.

Allow me to outline my objections:

1. **Health Impact:** Incinerators emit harmful pollutants, including heavy metal, dioxins, and particulate matter. These pollutants can lead to respiratory problems, cardiovascular diseases and even cancer. Given our town's compact size, the health risks would be disproportionately high.
2. **Air Quality:** Our town already faces traffic-related air pollution due to its busy roads. Adding an incinerator would exacerbate air quality issues, affecting the well-being of residents, especially children and the elderly.
3. **Noise and Odor:** Incinerators generate noise during operation, disrupting the peace and tranquility of our community. Additionally, the smell of burning waste is unpleasant and can impact the quality of life for everyone nearby.
4. **Waste Management Alternatives:** Instead of incineration, we should explore more sustainable waste management solutions, such as recycling, composting and reducing waste at the source. These methods would align better with our community's values.
5. **Environmental Concerns:** Incinerators contribute to greenhouse gas emissions and climate change. As responsible citizens, we must prioritise cleaner alternatives to protect our planet.

In light of the above, I urge the council to reconsider the approval of this incinerator project. I request a thorough environmental impact assessment and transparent public consultations to ensure that our voices are heard (especially considering the fact that this has already been rejected once before).

I kindly ask that you take into account the well-being of our residents, the preservation of our town's character, and the long-term consequences of this development.

Thank you for your attention to this matter. I trust that you will make an informed decision that benefits our community and the environment.

Sincerely,

XXXXX

267 To whom it may concern,

I am writing to express my strong opposition to the proposed incinerator project in Sowerby Bridge.

I firmly believe that building an incinerator would have detrimental effects on our environment, public health, and overall quality of life.

- Incinerators emit harmful pollutants posing serious health risks to nearby residents, particularly children, the elderly and individuals with pre-existing health conditions.
- The release of greenhouse gases from the combustion process contributes to climate change, adding onto the global environmental problems worse.
- Incinerators can produce unpleasant odors and noise pollution, which can negatively impact the quality of life for residents in the surrounding area.

I respectfully urge you to reconsider the proposal for the incinerator project and explore more sustainable, environmentally friendly solutions for waste management in our community as building an incinerator may perpetuate a reliance on traditional waste management methods, rather than promoting more sustainable alternatives such as recycling and composting.

Thank you for your attention to this matter. I look forward to hearing your response.

Sincerely,

XXXXX

Dear sir/ madam,

I hope this email finds you well. I am writing to express my strong objection to the new application submitted by Calder Valley Skip Hire for the construction of an incinerator in Sowerby Bridge. As a concerned resident of the area, I firmly believe that the construction and operation of such a facility would have detrimental effects on our community and the environment.

First and foremost, the proposed incinerator poses significant health risks to the residents of Sowerby Bridge and the surrounding areas. Incinerators emit harmful pollutants such as particulate matter, heavy metals, and dioxins, which can have serious implications for respiratory health and overall well-being. These pollutants have been linked to respiratory diseases, cardiovascular problems, and even cancer. Given the proximity of residential areas to the proposed site, the potential health impacts cannot be ignored.

Furthermore, the construction of an incinerator would exacerbate environmental concerns in our already fragile ecosystem. The release of pollutants into the air and soil could contaminate water sources, harm wildlife, and disrupt delicate ecological balances. Sowerby Bridge is home to diverse flora and fauna, and it is our responsibility to safeguard this natural heritage for future generations.

In addition to health and environmental concerns, the incinerator would also have negative socio-economic implications for the community. The presence of such a facility could decrease property values, deter potential investors, and damage the reputation of Sowerby Bridge as a desirable place to live and work. This could have far-reaching consequences for local businesses and residents alike.

Given these concerns, I urge you to carefully consider the implications of granting approval for the construction of the incinerator. I implore you to prioritize the health, safety, and well-being of the residents of Sowerby Bridge by rejecting this application.

Thank you for taking the time to consider my objections. I trust that you will make the right decision for our community and the future of Sowerby Bridge.

Sincerely,  
XXXXX

269	<p>I am writing this email to object for the incinerator in Sowerby Bridge. As a resident of Sowerby Bridge i am very disturbed by this . Especially after being rejected once by an independent inspector.</p> <p>Some of the points i would like to make are the following:</p> <p>1: Far too many houses and residents.</p> <p>2: Health risks: such as harmful emissions, increasing the risk of respiratory illnesses, cardiovascular diseases, and certain types of cancer.</p> <p>3: Air pollution: Nitrogen oxides, sulfur dioxide , and volatile organic compounds into the air.</p> <p>Overall, while incineration may offer short-term solutions for waste management, its negative environmental, health, and social impacts make it a controversial and often undesirable option in many communities.</p>
270	<p>Please note my absolute objection tin to the establishment of a waste incinerator in the Sowerby Bridge area and my dismay that right and rigorous planning processes are being 'worked around'. I am concerned about the effect of waste incineration on health and quality of lie. I am concerned about many issues including traffic, noise, property values and the use of such a site in an already commercially and economically challenged area. Sowerby Bridge needs right and dynamic investment to elevate the town and district. It does not need or want this incinerator.</p> <p>Please register my objection</p> <p>XXXXXX</p>

271 I hope this email finds you well. I am writing to express my strong objection to the recent application submitted by Calder Valley Skip Hire for the construction of an incinerator in Sowerby Bridge.

As a resident of this community, I am deeply concerned about the potential consequences of such a facility on our health, environment, and overall quality of life. Incinerators emit harmful pollutants into the air, including dioxins, heavy metals, and particulate matter, which pose significant health risks to nearby residents, especially vulnerable populations such as children and the elderly.

Furthermore, the proposed location of the incinerator raises serious environmental concerns. Sowerby Bridge is an area of natural beauty, with rich biodiversity and important ecological habitats. The construction and operation of an incinerator would not only degrade our environment but also disrupt local wildlife and ecosystems.

In addition to the environmental and health risks, the presence of an incinerator could also have detrimental effects on property values in the area. Many residents, myself included, have invested our savings and resources into our homes, and the prospect of a nearby incinerator could significantly diminish the value of our properties.

Moreover, the community has not been adequately consulted or informed about this project. It is essential that residents have a meaningful opportunity to voice their concerns and participate in the decision-making process regarding developments that will directly impact our lives and well-being.

Therefore, I urge you to carefully consider the objections raised by myself and other concerned residents regarding Calder Valley Skip Hire's application for the incinerator in Sowerby Bridge. I strongly believe that this project is not in the best interests of our community and urge you to reject the application.

Thank you for your attention to this matter. I look forward to your prompt response.

Kind regards

XXXXX

Sent from my iPhone

272	<p>My name is XXXXX, resident of the Calder Valley. I am writing to object the incinerator application. I believe this will have a negative affect on the area, causing noise and air pollution. This is not an appropriate place for such a toxic installment.</p> <p>Regards XXXXX</p> <p>_____ "</p>
273	<p>Dear Sir/madam,</p> <p>I would like to object in the strongest possible terms to the proposed incinerator in Sowerby Bridge. This incinerator has already been refused once by the government planning inspector. How much more of your time and our money will be wasted by this company? I must implore you, the council, to stand up for the health and clean air of the good people of Sowerby bridge. The air quality is already poor, because of the traffic bottleneck on the high street and this incinerator will only make matters worse. The computer modeling is a simulation and not fact. Are you really prepared to gamble with the health of our children, our community in this way? There are schools less than a mile from the site. Please think of the children. It's all of our air, we cannot help but breathe it. Please support the residents of Sowerby and resist this incinerator, which would be more wisely placed elsewhere. Yours in good faith, XXXXX</p>
274	<p>Good afternoon,</p> <p>I would like to object about the application to install an incinerator in Sowerby Bridge.</p> <p>It will create air pollution, noise and a negative effect to the environment in the Ryburn Valley.</p> <p>Kind Regards</p> <p>XXXXX</p>

275

Hi

I live at XXXXX

I object to the planning application S13/006 by Calder Skip Hire.

The incineration process will increase air pollution in our town. Sowerby Bridge air quality is already poor and the proposed plant will only make it worse.

I therefore object to the proposal

Regards

XXXXX



276

Good afternoon,

I'm writing to express my objection to the proposed incinerator in Sowerby Bridge.

I find it horrifying that an application already rejected is being considered again.

As a mother of a young child and due another baby soon I am beginning to question whether I want to raise my children in an area that could become very polluted.

Please see below some key objections, many of which were raised at the recent meeting at Foundry Street Community Centre.

1. CVSH have provided data from Leeds/Bradford airport to try prove their waste will clear naturally (However, we live nowhere near the airport, we are a unique valley and nothing like the environment near the airport!)
2. How the air quality will be affected, Sowerby Bridge already has high pollution levels especially with us being so close to the motorway and the regular closures causing more traffic to flow through.
3. The company and shareholders are trying to go above the higher court ruling which shouldn't be allowed in itself.
4. The chimney stops considerably lower than the surrounding trees and hillside, not to mention Norland above.
5. Far too many houses and residents in the immediate areas.

I sincerely hope the correct decision will be made.

Best wishes,  
XXXXX

277

Hello,

I am writing to voice my concern about the incinerator proposal.

Firstly, the area is already disproportionately affected by pollution. The incinerator would be detrimental and the evidence they have provided to suggest that the air will be clean was not implemented in a valley, this impacts the validity of the information.

Secondly, the appeal seems undemocratic - it has been rejected and the views of the community have not changed. They are wasting council time and resources - there needs to be a longer time frame between their appeals or more forceful implementation of the ruling. They are using bullying tactics and the community is tired of it.

Thirdly, the valley is home to several schools and nurseries - children's health should always be a priority.

Kind regards,

XXXXX

278 Good afternoon,

I wish to make an objection to the proposal that Calder Valley Skip Hire could be granted the permission to operate an incinerator at their Sowerby Bridge site.

As a local resident who suffers with 2x lung conditions (asthma and sarcoidosis) who struggles to breathe on a daily basis I think it is ludicrous that Calder Valley Skip Hire could potentially pollute gases from a chimney in the bottom of a valley therefore posing further risk both my health and that of local people and the environment.

Breathing clean air is a basic right that should be protected for our community. Unfortunately Sowerby bridge already has plenty of fumes from all the traffic that passes through each and every day and as somebody with lung issues I can really tell the difference when I visit different areas/go on holiday and my breathing is so much better.

Sowerby Bridge is in a valley and polluting gases from the chimney will not be dispersed above the level of the houses along the valley and hillsides but will be in the air breathed by all who live here. There are 9 schools within 1 mile and 18 schools within 2 miles of the chimney. The schools in close proximity are all above the proposed chimney height. A public footpath runs close to the site. Calderdale had the highest rate of respiratory tract infections in West Yorkshire for infants under one year in 2016 & asthma admissions in 2019.

The proposal uses data from the weather station at Leeds Bradford Airport to show that the gases will be dispersed. This is nowhere near the Ryburn Valley and the landform is completely different. The steep-sided Ryburn valley and prevailing winds mean that emissions will frequently blow towards the centre of the local population. In windless conditions, local residents regularly see smoke and mist hanging for long periods in the valley.

There are reasonable doubts as to whether CVSH would operate an incinerator correctly. Already, there have been several fires and there is also a flood risk. CVSH have shown the wrong postcode on the application for a place not at risk of flooding.

The risks to our air quality and health are simply too high.

Frankly, it's a ludicrous suggestion and any decision to go ahead with this proposal would be an absolute joke.

Regards,  
XXXXX

279

Hello there

I wish to object to the new application being presented by Calder Valley Skip Hire in relation to their Incinerator use.

1. CVSH have provided data from Leeds/Bradford airport to try prove their waste will clear naturally (However, we live nowhere near the airport, we are a unique valley and nothing like the environment near the airport!)
2. How the air quality will be affected, Sowerby Bridge already has high pollution levels especially with us being so close to the motorway and the regular closures causing more traffic to flow through.
3. The company and shareholders are trying to go above the higher court ruling which shouldn't be allowed in itself.
4. The chimney stops considerably lower than the surrounding trees and hillside, not to mention Norland above.
5. Far too many houses and residents in the immediate areas.

On the basis of the above points I wish to object against the application for the use of the incinerator by Calder Valley Skip Hire. As such I would ask that this application is rejected.

Kind regards  
XXXXX

280

Please include this email as an objection to the Sowerby Bridge incinerator.

The air quality is already in need of improvement, it is especially unfair on the residents in the valley but it will also affect those who choose to visit or travel to Sowerby Bridge.

XXXXX

281

Please include this email as an objection to the Sowerby Bridge incinerator.

The air quality is already in need of improvement, it is especially unfair on the residents in the valley but it will also affect those who choose to visit or travel to Sowerby Bridge.

XXXXX

282

I wish to objection to the above.

Their application has already been refused, and the reasons for objecting remain unchanged

The application is to operate the site 24 hours a day, Monday to Friday, 52 weeks of the year, burning 2 tonnes per hour of industrial waste, and discharging the waste gases into the Sowerby Bridge Valley Bottom.

1. The discharge of these gases from the exhaust stack, sited low in a steep sided valley, surround by trees, would be potentially harmful to public health, and the environment.

2. It would effect the air quality in the Sowerby Bridge Improvement Area, which is 670 metres from the stack.

3. The effect of extra lorries transporting 2 tonnes of industrial waste 24 hours a day, 5 days a week, 52 weeks a year, would cause additional traffic congestion and add further to the air pollution in the vicinity of the site.

I would ask our MP Craig Whittaker, and our local councillors, to add their support to this objection.

XXXXX

283

Dear Sir/Madam,

As a resident Sowerby Bridge I am writing to object to the building of an incinerator by Calder Valley Skip Hire. I'm against the incinerator being built and wish my objection to be recorded.

Yours,

XXXXX

284

I must write to oppose this construction as I have no faith in the company to stick to any promises or policies they make. I have no faith they are competent to run it with their operative staff.they don't give a fig for the people who actually work and live in the valley, or the pollution they will create. As I'm sure we're all aware the owners live well away beyond and

above any poisons their money spinning endeavor will create.

This monstrosity must be permanently refused as the most singularly unsuitable position for an incinerator on the planet.

285 Dear sir/madam

I would like to object to the building of the incinerator at the Belmont site as it is in a valley and the chimney stack height is woefully low to avoid pollution and Sowerby Bridge is already heavily polluted with daily traffic and worse when the motorway is shut.

Also the pollution data provided is from Leeds Bradford airport and as such should be rejected and proper data provided from the site

Noise from the site would be cacophonous 24hr a day 5 days a week , we can already hear the noise from the site now Entry / exit is not fit for purpose as there would be more and bigger lorry's so a possible accident waiting to happen

Yours XXXXX

286 I wish to register my objection to the Calder Valley Skip Hire application for an incinerator on Rochdale Road.

This was refused at appeal and there should be no reason why it is being reconsidered again by the Council. I have heard that they refuse to vote on the matter – even though the first hearing was pretty much an open and shut case – and I can't understand why they are allowing this to go through again.

From what I have seen of the application the computer model data is based around Bradford Airport pollution information and is completely irrelevant for our valley with its woods. To allow a waste incinerator to run 24 hours a day for 5 days a week so close to the centre of Sowerby Bridge with several schools so close and houses all the way up the opposite valley side shows no consideration at all for the health of children and residents. This country is currently trying to reduce the impact of carbon on the environment and already has more public incineration facilities than it needs (based on the Government's own figures) so there can be no positive reason for such an installation other than the greed of Calder Valley Skip Hire (a company who currently show no concern for the environment when you see the amount of rubbish that they put in and around the river).

None of the political parties support this application, none of the residents support it – I doubt any of the Councillors support it – so why this has got here is unfathomable. Please, please do the right thing and reject this application for the good of all of us.

Yours sincerely,

XXXXX



287 To whom it may concern,

“Air pollution is impossible to escape, It is all around us. Microscopic pollutants in the air slip past our body’s defences, penetrating deep into our respiratory and circulatory system, damaging our lungs, heart and brain.”

Imagine my disgust knowing the air quality in Sowerby Bridge might be about to get substantially worse.

My husband and I recently bought our first house in Sowerby Bridge and have been loving integrating ourselves in to the community. We are currently trying for a baby but the potential incinerator news a has stopped us in our tracks.

“Pregnancy and infancy are crucial periods of vulnerability. The pollution buildup in the placenta can limit the fetus's growth, resulting in preterm birth, limited fetal growth, increased gestational diabetes, shorter telomere length, higher uterine vascular resistance, and reduced chromosomal stability. Placental vascularization is one of the many well-known harmful effects of air pollution on pregnancy [1]. In recent years, the amount of research on how pollution affects human health has grown dramatically. Many studies have demonstrated that exposure to pollutants during pregnancy, a critical period for mother-fetus development, may have a major, lasting effect on an unfavorable pregnancy [2]. One of the main causes of sickness and mortality that may be both restricted and managed is exposure to air pollution, which can occur in both open and enclosed places.”

If this goes ahead we will feel we have no choice but to move area - which will be very sad and certainly lead to us losing money and new friends but health has to come first.

Breathing clean air should be a basic right!

I cannot object strongly enough to this going ahead and am outraged that it has been resubmitted.

Please let me know if there is anything further I can do to stop this happening.

Yours faithfully,

XXXXX

288

Dear Sirs,

I am writing to express my strong objection to the proposed establishment of a waste incinerator in our residential area and would invite you to refuse the application for an environmental permit by Calder Valley Skip Hire. As a resident of XXXXX, I am extremely concerned by the potential consequences this project could have on our community, our health, and our environment.

First and foremost, it is well documented that the installation of a waste incinerator in such close proximity to residential properties poses significant health risks to the residents. Incineration releases a variety of harmful pollutants into the air, including dioxins, heavy metals, and particulate matter, all of which have been linked to serious health problems such as respiratory illnesses, cardiovascular diseases, and even cancer. Given that our residential area is home to families, children, and elderly individuals, knowingly exposing them to such hazardous emissions is simply unacceptable. Sowerby Bridge is already suffering from air pollution to the extent that it has been deemed an air quality management area, and to compound the existing hazard with an entirely avoidable increase in toxicity would be a dereliction of Council duties to the community.

Furthermore, the presence of a waste incinerator in our neighbourhood is likely to have detrimental effects on the environment. Despite advancements in emission control technologies, incineration still contributes to air and soil pollution, as well as greenhouse gas emissions, thereby exacerbating climate change and further jeopardizing the well-being of future generations. Moreover, the transportation of waste to and from the incinerator site along Rochdale Road would increase traffic congestion and noise pollution on our already congested and densely populated roads.

In addition to the health and environmental concerns, the proposed waste incinerator could also have negative implications for our property values. The stigma associated with living near such facilities could deter potential buyers and lead to a decline in property values, thereby harming the financial well-being of homeowners in the vicinity.

Furthermore, it is imperative to consider the social implications of siting a waste incinerator in a residential area. As in this matter, such projects often face opposition from local residents, leading to community discord and a breakdown in trust between residents and local authorities. By directly disregarding the concerns and objections of the affected community, the proponents of the incinerator risk alienating the very people they are supposed to serve. It is staggering that the Council has taken the decision to avoid voting on this matter, instead delegating the decision to unelected and inexperienced Council Officers. Moreover the rationale behind such undemocratic methodology and ill informed decision-making could lead to adverse inferences made against the Council. The process should be scrupulously transparent and seen to be above board at every stage.

The latest incarnation of the CVSH application appears to be devoid of any checks and balances as the inspection records are not offered to ensure compliance. Not only should due process and impartial observance be a factor of such applications, it raises serious questions as to the motives of the applicants to avoid scrutiny.

In light of the aforementioned concerns, I urge you to refuse the application of Calder Valley Skip Hire for an environmental permit and deny permission to construct the waste incinerator in our residential area. Instead, I implore you to explore alternative waste management solutions that are less harmful to public health, the environment, and the well-being of our community as a whole.

Thank you for considering my objections to this matter. I trust that you will give careful thought to the concerns raised by myself and other concerned residents, and take appropriate action to safeguard the best interests of our community.

Yours faithfully,

XXXXX

289 Hello

Please register my objection to the incinerator proposed for the Ryburn Valley near to Sowerby Bridge. There is a national oversupply of incinerators and this one would create disastrous pollution in a narrow valley.

XXXXX

290 To whom it may concern,

I would like to express my objection to the above plan to install an incinerator in the village where I live. This causes me great concern for the health of my two children and the children at the local schools.

I live just above the area where it would be installed (XXXXX) and am already conscious of the things they burn and the noise of the machines they run every night throughout the night, which I hear within my house.

I am not sure why the councillors are not voting, this will have a direct impact on the community they serve. Nor am I sure why they will not be monitoring it for compliance if it's gets the go ahead.

I am lost for words as to why you would want to put this upon the village, which is already suffering from pollution.

I COMPLETELY AND UTTERLY OBJECT.

Regards,  
XXXXX

291

Hello,

I am writing to you to express my deep concern for the Sowerby Bridge community and their well-being if the plan for an incinerator goes forward.

Please do not put the community through this. It is a treasure of a town and will be damaged in more ways than one could imagine.

Please take this as my strong objection to the plan.

Yours sincerely,  
XXXXX

292A To whom it may concern,

I am writing to vehemently object to the above application put in - once again - by Calder Valley Skip Hire to run an incinerator and burn waste in our beautiful Ryburn Valley.

I find it incredulous that as a community we are faced with this awful dilemma once again despite a highly respected Government inspector (John Woolcock) categorically rejecting the application to burn on the grounds that CVSH were "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment".

Their latest attempt to justify this by using dispersion modelling based on Leeds Bradford Airport from 2013 - 2017 is so laughable that it should be chucked out straightaway by anyone with a semblance of knowledge on the subject. How that modelling can be deemed admissible is frankly embarrassing when you are comparing a deep sided valley to the highest airport in England. The minimum requirement is that any modelling should be based on what happens in such a valley, and if that is not provided, it should be dismissed forthwith. If the people overseeing the application do not do that, then in my view they are not fit to make a decision on the matter, and are not acting in the best interests of the constituents of Sowerby Bridge and beyond.

I would also like to allude to the Climate Action Plan currently being promoted by Calderdale Council. I could quote many pieces throughout it but on page 4 of the document it states...

" However, we can't continue to burn fossil fuels and live unsustainably. Burning them releases dangerous, planet-warming gases. Fossil fuels have warmed the planet by more than 1°C above pre industrial levels and altered the climate. We can see the impacts of climate change outside our window: our seasons are changing. You may have noticed that in the last decade, flooding in Calderdale has been worse than ever before.... "

Given that, how on earth have the council decided to abdicate responsibility on this decision when in their OWN policy they highlight more than once that burning is not the way forward and it releases 'dangerous, planet-warming gases'. Their words, not mine, yet they have decided not to follow their own policy and shy away from making a decision. I find that utterly pathetic and those in charge should hang their heads in shame.

Also I wish to point out the flooding aspect which is also mentioned in the above. It is well known that CVSH are on a

high risk flood plain and it's a common feature if you wander down after heavy rain to see countless surface water on their site. How on earth this site then can be deemed safe to run an incinerator with such a risk of flooding is beyond any reasonable logic. It's also worth mentioning that they have never built the flood wall which was meant to be a condition of the site. Instead they've just used rubbish as a 'boundary wall' between them and the river, which when it rains just tipples into the river. Does that fill you with confidence they have the interests of the environment at the forefront of their thoughts, and that this is a company who should be allowed to run an incinerator? If you do, you should look for another job.

As for air quality management, Sowerby Bridge is already suffering from pollution and is in an Air Quality Management Area. This proposed incinerator is only within a few hundred metres of the centre of Sowerby Bridge, and on the doorstep of many residents like myself. How such a project can even be considered makes a mockery of the aims of the above, and a complete disregard of the health of the residents of the Ryburn area. My daughter suffers from asthma and there have been countless occasions over the past decade I have stopped her from playing outside because of the rotten stench that emanates from the cesspit that is CVSH. To also add to that if they are allowed to burn, is a complete dereliction of the moral obligation the council, and their paid officials have, to the very people you are paid to protect, and not help line the pockets of wealthy people who have zero interest in safeguarding the best interests of the community. As adults, our most important role is to make the environment a better place for our children and grandchildren, and that must never be compromised when tough decisions have to be made.

I will finish by saying that I was present at the recent meeting hosted by XXXXX and the XXXXX, which XXXXX and numerous councillors opposed to the incinerator also attended. The strength of feeling against the application was palpable, even more so than at any time throughout this stressful last decade fighting this cause. I can assure the people of Sowerby Bridge and beyond will continue to fight this again and again, and will not forget those who supported us, and those who didn't.

For the sake of the children of Calderdale, do what is right and reject this application.

Regards,  
XXXXX



292B Good afternoon,

I am forwarding an email to both of you given your position within the council, which I have just sent to the environment agency.

However, given you are responsible for the health of the community, I feel it is equally important that you should be made aware of what is currently taking place at Calder Valley Skip Hire.

I view this as an extremely serious matter and that it will be treated as such. Questions need to be asked from yourselves and the environment agency as to what they are doing? This is not recycling, this is purely dumping waste.

Regards,  
XXXXX

292C Good afternoon XXXXX,

Thank you for your reply.

With regards the environment agency, I received an automated response about my first contact saying the matter had been logged and would be looked into.

I then rang the emergency helpline on Friday about the odour, and the gentleman I spoke to about the matter recorded my observations and said it would be passed on to the relevant department. I have since heard nothing further from them.

Kind regards,  
XXXXX

292D Good morning,

Further to my email earlier in the week, I have again contacted the environment agency this morning to complain on this occasion about the obnoxious odours emanating from the CVSH site.

Even by their standards, they are notably bad today, and there's little doubt in my mind they are emanating from the waste mountain they created on their forecourt earlier this week.

As Environmental Health officers, may I ask what is your role in dealing with such foul odours when considering the health and wellbeing of the community?

Regards,  
XXXXX

293 Hello

I am writing to inform you that I strongly object to an incinerator being developed in Sowerby Bridge.

Kind regards,  
XXXXX

294 To whom it may concern,

I would like to state my objection to the new proposal for an incinerator. The air in the Calder Valley is already subject to improvement requirements and the emissions from this chimney will be a backwards step for the population of the valley and there health. There are already so many people suffering with respiratory issues and this will make things worse.

I also understand that the following are reasons for it not to progress.

i) Due to potential harm to public health and environment from waste gasses which would be permitted to be discharged in Sowerby Bridge valley bottom Monday to Friday, 24hours a day, 52 weeks per year as the Incinerator has applied to burn 2 tonnes per hour of industrial waste.

ii) Effect on AIR QUALITY Improvement Area in Sowerby Bridge which is 670 metres from exhaust stack

iii) Effect on traffic congestion on AIR QUALITY Improvement Area in Sowerby Bridge by extra lorries to and from the site 670 metres from Sowerby Bridge transporting 2 tonnes of industrial waste Monday to Friday, 24hours a day , 52 weeks per year.

Please stop this application from harming our valley.

Kind regards  
XXXXX

295 To whom it may concern,

I am writing to object to the environmental permit submitted by Calder Valley Skip Hire for the operation of a SWIP, at Belmont Trading Estate, Rochdale Road, Sowerby Bridge.

The application submitted is a resubmission of the 2020 application, which was refused at appeal in July 2023 by a Government Planning Inspector. The inspector stated that he was unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment. Therefore this application should not have been resubmitted and should not be granted.

Furthermore whilst further air quality assessment work has been carried out in relation to additional sensitivity tests, has the assessment been undertaken using up date weather data? The original assessment was undertaken using weather data from Leeds/Bradford airport and the data is now 7 years out of date.

The airport is located over 17 miles from Sowerby Bridge therefore the weather data is not acceptable for the air quality model used for the assessment. The topography of the Ryburn Valley is completely different to the location of the airport. It is in a valley which acts as a funnel. The prevailing wind is from the west and will disperse waste gases from the SWIP into Sowerby Bridge which is already suffering from pollution and is within an Air Quality Management Area. Smoke and mist often hangs over the valley bottom at this location and therefore will trap fumes and inversion can stop waste gases dispersing as was evident after a large fire at the site. Surely up to date weather data from the local area should be used when making such an important decision.

Has consideration been given to the level of recycling, in Scotland and Wales where there is a moratorium on new incinerators recycling has gone up, surely recycling should take priority over the burning of waste? Calderdale has declared a climate emergency and therefore should be preventing new sources of pollution.

All local councillors, of all political parties and the two local MPs have opposed this application as do I. It is in completely the wrong location.

The permit should not be granted. Therefore please accept this as my objection to granting the permit for this SWIP, and send an e-mail confirming that you have received my e-mail.

Regards  
XXXXX  
XXXXX

296

I am writing to express my extremely strong objection to the proposed incinerator for Sowerby Bridge.

I need not go into detail for the reasons of pollution, breathing and health complications as they are both obvious and well documented. We all know the risks and dangers to health that this pollution would pose to every single resident of the valley.

Already the air quality is bad when there is an incident in the valley and the wind direction, or lack of, seems to trap the smoke/smells/pollutants in the valley.

Fourteen months ago I was diagnosed with stage three lung cancer, apparently caused 'by a pollutant entering my body'. Those were my oncologist's actual words. I had a big part of my lung removed a year ago and now live with the prospect of an uncertain future.

It is perhaps somewhat immoral to consider such a wilful decision that might put another family through what we have been through during the last year.

Think, act, and put a stop to this application now. Please.

Yours,

XXXXX

297

As a local resident, living near Wainhouse Tower. I would like to register my objection to the waste incinerator that CVHS hope to install. It would emit so many dangerous gasses into the air which, due to the local geography, and confirmed in previous safety reports, would not disperse safely.

XXXXX

298 Good morning,  
I am very concerned about the reapplication by Calder Valley Skip Hire to operate a waste incinerator on Rochdale Road in Sowerby Bridge. This incinerator would expel hazardous fumes 24 hours a day from Monday to Friday throughout the environment near our homes. There are lots of citizens who live nearby who do not wish to have their health to be put at risk by the toxic fumes given from an incinerator. It would be extremely irresponsible for this application to even be considered after it has previously been denied due to that the waste gases from the incinerator wouldn't be discharged in a controlled way as to safeguard human health and the environment. Please put the communities health first and please say no to the Sowerby Bridge Incinerator.

Kind regards  
XXXXX

299 To whom it may concern,  
  
I am XXXXX and am against the incinerator inputting. I live near CVSH and don't want to have to smell of and smell the incinerator and don't think it should be put in, as I don't think it ever should have even been considered. I live at XXXXX and am worried about the impact that it may have on me, my family, and the society. The health implications worry me as there are different age groups in the area which may be more affected then others. I hope the council make the right decision and don't let the incinerator be built.

Regards,  
XXXXX

300

Dear sirs

As a resident of Sowerby bridge I strongly object to the application for an incinerator license being granted to Calder valley skip hire (or any other business in the area)

On Saturday, I attended the foundry street community centre meeting with Calder Valley skip hire to stop the new incinerator at the Belmont site.

1. CVSH have provided data from Leeds/Bradford airport to try prove their waste will clear naturally (However, we live nowhere near the airport, we are a unique valley and nothing like the environment near the airport!)
2. How the air quality will be affected, Sowerby Bridge already has high pollution levels especially with us being so close to the motorway and the regular closures causing more traffic to flow through.
3. The company and shareholders are trying to go above the higher court ruling which shouldn't be allowed in itself.
4. The chimney stops considerably lower than the surrounding trees and hillside, not to mention Norland above.
5. Far too many houses and residents in the immediate areas.

Granting permission for this incinerator will severely damage the local area.

Yours sincerely  
XXXXX



301 Good evening,

I am writing to formally object to the application of the incinerator on Rochdale Road by Calder Valley Skip Hire.

I believe this would be absolutely catastrophic if this was to be granted, and myself and thousands of residents would lose all faith in the local council.

Thank you,  
XXXXXX

302 Good evening,

I am writing in objection to the SWIP at Belmont Industrial Estate in Sowerby Bridge.

I do not live in the immediate vicinity of the proposed development but I am a member of a local running club. With other cuts and cost increases I greatly value the ability to get out in fresh air for my exercise : both for my physical and mental health.

As a southerner by birth I am proud to have called Calderdale my home for the past 8 years. When I moved the Council were promoting the natural beauty as a key benefit of the area. Have they now decided this isn't important and it would better serve them to pollute what nature has given them for free?

The proposed plant's location clearly doesn't allow for the impact on the natural richness nearby. Due to local geographic conditions it would undoubtedly also pollute the homes lining the valley, thereby instigating a public health situation. And the tourism on which Calderdale and the local economy depend so much would be devastated by dirty, smelly air and environment.

Thankfully the squalor of the industrial heritage of our area has been replaced by many beautifully restored buildings, natural beauty and a community who care about the sustainability of our corner of West Yorkshire. Please don't let short-sighted false economy decision-making ruin an otherwise pretty good track record.

Or has your common sense been lost in the potholes too?

Yours clean breathingly,  
XXXXX

303

Hello

I am writing to ask that permission is refused for the siting of a proposed waste incinerator on Rochdale Rd Sowerby Bridge.

Sowerby Bridge already suffers from pollution and the suggested position of this incinerator would add to that. Waste gases would not be blown away but linger in the valley where residents would have no option but to breathe in the polluted air.

The ADMS computer model does not use local weather data and cannot accurately predict that fumes will not linger in the valley. Mist and fire smoke can be seen staying why should this discharge be guaranteed to be different?

This is not what a council should agree to.

Yours sincerely

XXXXX

304

Hi,

Please take this email as my written objection to the application S13/006 for an environmental permit to operate a waste incinerator in the Sowerby Bridge area.

I live on XXXXX and frequently travel past the proposed site. It would be a travesty to allow an incinerator in our little town. If there's ever a fire in that area it lingers in the narrow stretch. I don't want to bring up my children so close to the smell and air pollution the incinerator would cause.

XXXXX

305 Dear Sirs

I am my entire family thoroughly object to the proposed incinerator at CVSH Sowerby Bridge.

I myself formerly worked in the waste industry and believe that I have a good grasp of the situation when it comes to the disadvantages of incinerator use.

Firstly, do YOU, council members, wish to be part of the enquiry into a child dying due to pollution such as what happened in London?

That was just from traffic pollution this is massively worse.

Secondly, the company in question has tried to sidestep objections via inserting the wrong address details to indicate where the incinerator is to be operating from.

CVSH have been shown to be using entirely inappropriate geographic and topographic findings and reports in order that the pollution that WILL be caused looks much 'less'

When an entity needs to 'normalise' bad practice, and needs to 'normalise' dishonesty, then very likely, the situation is not 'normal'.

Please realise, clean air is a basic human right.  
Getting away with lies and deceitful actions is not.

CVSH, is demonstrably very poor at dealing with environmental issues, I ask that if nothing else, the council inspects the Ryburn River and bank areas which their site backs on to. It is an absolute disgrace.

Sincerely

XXXXX

306 I would like to register my objection to the planning application S13/006 the proposed incinerator facility. I object due to the location. We live in a valley, a valley that already has poor air quality due to the heavy traffic experienced through the valley on a daily basis. The area is heavily populated and the health of the residents, especially children and the

infirm/elderly must be considered when subjected to the increased pollution. During winter months every misty day will hold the emissions within the valley basin. The proposed site is completely inappropriate.

307 Dear Sir/Madam,

I am writing to strongly object to Calder Valley skip Hire's proposed Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

The location of the proposed incinerator is not suitable. As stated by John Woolcock (a government planning inspector), on his inspection of the site, given the height and proximity of the smoke stack to trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment."

In addition to the above I am concerned about the impact the proposed incinerator would have to my family, friends and local residents. This is for the following reasons:-

As is widely known incinerators emit particles. The Committee on the Medical Effects of Air Pollutants (COMEAP) has published a series of statements and reports on the effects of air pollutants on health in the UK. It is accepted that exposure to current levels of common air pollutants damages health. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland seeks to reduce concentrations of air pollutants. Where concentrations of air pollutants are raised, Air Quality Management Areas are defined and plans to reduce concentrations are developed by Local Authorities.

Sowerby Bridge is already in an Air Quality Management Area and this is 670 metres from the proposed incinerator. In addition to greenhouse gas emissions that exacerbate climate change, incinerators emit many toxins and pollutants that harm local air quality. Emissions include dioxins, NOx and ultrafine particulate matter that can be harmful to both human health and the natural environment. Incinerators emit large quantities of CO<sub>2</sub>, roughly one tonne of CO<sub>2</sub> for every tonne incinerated. About half of this CO<sub>2</sub> derives from fossil sources such as plastic. For decades incinerators have been releasing harmful greenhouse gas (GHG) emissions without compensating society for the associated harm that this has caused.

Both long-term exposure and short-term increases in exposure to particles can damage health. This is widely accepted (World Health Organization, 2006). Long term exposure affects the risk of mortality, especially from cardiovascular disease and from lung cancer (COMEAP, 2009, COMEAP, 2006; Health Effects Institute, 2000). Short-term increases in concentrations cause cardio- respiratory effects including an increase in deaths from heart attacks and from respiratory

disease, increased hospital admissions for treatment of these disorders and increases in related symptoms. No thresholds of effect can be identified for either the effects of long-term exposure or for the effects of short-term increases in concentrations. Thus, any increase in particle concentrations should be assumed to be associated with some effect on health.

One of the most worrying aspects within the application submitted is Calder Valley Skip Hire have removed the council's ability to monitor compliance in the operation of the incinerator.

As a resident of the Sowerby bridge area I believe that breathing clean air should be a basic right of any community. I am deeply disappointed that Calder Valley Skip Hire continue to submit applications despite numerous application being rejected.

Kind regards

XXXXXX

308 We most strongly object to the newest attempt by Calder Recycling to erect an Incinerator at their site below the A58 in Sowerby Bridge. Our reasons are, -the increase in heavy traffic through Sowerby Bridge adding to:-  
Further delays and standing traffic.  
Increase in Air Pollution & Diesel Fumes  
Potential Acrid Smells  
Increase in parked wagons on the A58 whilst waiting to enter the site.  
Please don't let the Ryburn Valley be spoilt forever.  
XXXXX



309

Dear Sirs

I am writing as a resident of XXXXX to object to the above proposed Incinerator in the Sowerby Bridge.

Having lived in the XXXXX area for around XXXXX years now, I have been surprised by how poor the air quality is, given the rural location of the town. The geography of the town in a steep sided valley regularly attracts low lying fog, mist and fumes. The valley floor running along Rochdale Road seems to be one of the worst affected areas and the air pollution and air quality is very poor here and along the valley, with the high traffic volume, poor traffic management and the steepness of the valley all exacerbating the diffusion of smoke and fumes leaving a higher concentration of fumes lingering here.

I regularly run and walk this route and find it quite difficult to bear especially at times of peak traffic. I can only imagine how much worse this would be made with a waste incineration plant burning. It seems very counter intuitive to permit an Incinerator to be built in the bottom of a steep sided valley with a high residential population nearby when the area already has well documented poor air quality.

I know there are a large amount of primary schools within a short distance of the proposed Incinerator site but there are also a number of children's nurseries including Triangle House Day Nursery, Grass Roots Early Years Provider, Sowerby Bridge Day Nursery and New Road Nursery which all host infants and children between the ages 0-4 yrs old. These young children spend much of the day outside when weather permits. It appalls me to imagine their poor, developing lungs inhaling increased toxins and fumes from an incineration plant less than 1 mile away and believe this has a strong possibility of adversely impacting young local children's health and comfort.

For the reasons outlined in this email please therefore deny the application for the proposed incineration plant in Sowerby Bridge and permit our local children the chance of a cleaner, healthier future.

Regards

XXXXX  
XXXXX

310	<p>To whom it may concern</p> <p>I am a local resident that lives in the bottom of the Calder valley, in Ripponden and own a business premises in the bottom of Sowerby bridge.</p> <p>I very strongly object to the proposed plans by Calder valley skip hire to start using their incinerator. I believe it will have a big negative impact on the air quality of the valley, is too close to houses and businesses and is not in a suitable location to be safe for residents.</p> <p>Sincerely XXXXX</p>
311	<p>We already have dangerous levels of air pollution due to a trans Pennines major road carving the town in half ,and with site of the incinerator on the west side of town the prevailing weather is going to make the situation much worse.</p> <p>Regards XXXXX Sowerby bridge resident of thirty years.</p>
312	<p>Dear Sir/Madam,</p> <p>I am writing to strongly object to the building of an incinerator at the Belmont site, Sowerby Bridge. I find it hard to believe that in this day and age we are burning our rubbish rather than finding environmentally sound ways of dealing with it.</p> <p>Sowerby Bridge already suffers from high air pollution with the motorway closures and traffic being diverted through the centre of town. Myself and my brother lived on wharf street in early childhood- the air pollution from the road alone left him with lifelong asthma. I dread to think what the effects of the added incinerator will do to the health of our young.</p> <p>Furthermore, the proposed site is a thriving area of wildlife with much greenery- something we are lacking even more in Sowerby Bridge after the seldom used bypass swallowed a huge green area.</p> <p>I beg you not to implement this deplorable idea. Please do not give me any more reasons not to raise my future children here.</p> <p>Regards,</p> <p>XXXXX</p>
313	<p>I'm objecting to the building of the incinerator due to the negative effect it will have on the Calder valley area. This is because the smoke particles produced will sit in the valley polluting the river and surrounding houses .</p>

314 Dear Sir /Madam  
I wish to put forward my objection to the incinerator plans by Calder valley skip hire in the Calder / Ryburn valley .  
This is on the grounds of increased air pollution in an area that is already highly polluted from heavy traffic .  
Valley's trap air as can be seen by cloud inversions in a morning and surely polluting particles will be trapped within putting people , livestock and riverlife at risk ?  
Please consider these factors and do not pass these plans .  
Many thanks ,

XXXXX

315 To whom it may concern,

I wish to object the proposal for the incinerator in Sowerby Bridge.

There are many reasons why I object..

1. The pollution in the valley is already high with the road carved through the centre, the incinerator will increase dangerous fumes which will have an adverse effect on humans and wildlife.
2. As a proud resident (XXXXX years) I feel Sowerby Bridge is a unique place to live and visit, the incinerator will not improve tourism as it is a complete negative reason to visit the valley.
3. Can you imagine this proposal put forward in Skircoat Green or Ripponden??  
Why make an already deprived area worse??
4. Is there a positive future for Sowerby Bridge??  
Yes!!! but not with the toxic fumes and noise of an incinerator.

I totally object!!!

Yours faithfully  
XXXXX

316 Good Morning

I wish to object again to the proposed Incinerator in Sowerby Bridge, for the following reasons

As we know incinerators emit large quantities of CO<sub>2</sub>, largely from fossil sources such as plastic, harmful to the planet. Greenhouse gases are released by incinerators therefore the planet again bears the brunt of this pollution. I am concerned about the health impact on the residents due to toxic air quality, well documented, local to the proposed incinerator and surrounding district.

Additional emissions from this incinerator will add to the already high level of toxins in some people, in particular infants and young children living and going to nursery and school down the valley.

The increased heavy goods traffic on an already very busy trunk road, with poor access to the site should be taken into consideration.

Potential harm to wildlife in the area as well as an unsightly negative environmental impact.

This project does not meet the requirements of the Waste Hierarchy, the incinerator will act as a disincentive to prevent, reuse and recycle.

I strongly OBJECT for all of the above reasons.

I wish to state that I find it remarkable that after being refused by the local authority and then at appeal that a new application is even being considered.

It feels like planning by attrition.

XXXXX

317 I am writing to express my absolute opposition to this application, how can we even consider this when there would be no official control or guarantees that air pollution would not be present in our valley.  
In addition, the proximity to residential properties, local schools and the effect this will potentially have on health and quality of life is a real consequence.  
Finally this will affect the level of tourism we have in the area, an important revenue for the Ryburn valley and surrounding area.  
This application must be rejected.  
Very concerned resident XXXXX  
Sent from my iPad

318 Calder Valley Skip Hire Application for environmental permit for Schedule 13 small waste incineration plant ref S13/006  
I strongly OBJECT to the application for an environmental permit, and I can't actually believe I am doing so yet again. An Inspector, who was appointed by the Government, rejected the application on appeal so that should be the end of it. Something is seriously wrong with the system in that Calder Valley Skip Hire (CVSH) have been allowed to put in yet another application. The Government Inspector, John Woolcock, dismissed the appeal and states in his conclusion "I am unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment."

The stack height remains the same, which is also an utter farce. CVSH say that a height of 12 metres would provide effective dispersion of emissions from the exhaust stack. How can it? The height doesn't even reach Rochdale Road. On another note, they are still using meteorological data from Leeds-Bradford airport for their model - "Dispersion model simulations have been performed using five years of data from Leeds-Bradford Airport between 2013 and 2017". According to Google Maps, Leeds-Bradford Airport is between 19.7miles and 32.1 miles (depending on which way you go) away, between 48 mins and 52 mins drive, and would be a 7 hour walk. How is it reasonable to use data from there when the SWIP is housed in a steep-sided valley, covered in trees, below the road line and extremely close to residential houses? When they have had fires in the past, the smoke has hung in the valley for days.

CVSH say there will be no emissions to surface water, groundwater or sewer from the SWIP. How do they know? As the saying goes, what goes up must come down.

CVSH are also next to a major river in which their waste falls into. They never built the wall around the site to protect from waste falling into the river. Whenever we have heavy rain the site fills with water and runs off into the river. They are classed as a high flood risk.

This company do not adhere to the conditions they are supposed to now, so how on earth can we have confidence in them to run an incinerator?

My daughter has asthma. I'm extremely worried as to what the impact this will have if the application is approved. I live opposite the site, I wouldn't be able to have any windows open, wouldn't be able to sit in the garden, my daughter wouldn't be able to play in the garden. All these are basic rights which will be taken away from us. It's bad enough now, with the foul smells and noises from the site and traffic. Large vehicles queuing on Rochdale Road to get in, causing mayhem. Also said large vehicles honking their horns when they come out of the site. Some of the vehicles are so full waste is spilling out of the sides onto the road, when these particular trucks go past they absolutely stink. Chains rattling on the skip trucks, despite the fact they are supposed to wrap them. When they drop a skip it is so loud that it echoes around the valley.

I attended the meeting between Clean Air Calderdale and the Benbow Group on Saturday 23rd March 2024. The community are against this, Holly Lynch MP and Craig Whittaker MP are against it, all Councillors from Ryburn and

Sowerby Bridge wards are against it. When are you going to listen to your community? Nobody wants this and you should hang your heads in shame that you are even considering this application. Particularly knowing full well that cabinet have abdicated responsibility for voting on this. How can a couple of council officials hold more power than a Government Inspector? One thing that worried me was several people describing CVSH as intimidating. I sincerely hope that intimidation isn't a factor in the decision making of the application.

I'd lastly like to point out the Calderdale Climate Action Plan 2023 you have published on your website. On page 4 you state "... We burn fossil fuels to warm our homes and workplaces, power our transport and factories, and create electricity. Most things we consume have a carbon (fossil fuel) footprint.

However, we can't continue to burn fossil fuels and live unsustainably. Burning them releases dangerous, planet-warming gases. Fossil fuels have warmed the planet by more than 1°C above pre industrial levels and altered the climate. We can see the impacts of climate change outside our window: our seasons are changing. You may have noticed that in the last decade, flooding in Calderdale has been worse than ever before."

How can you have the audacity to publish an action plan to become Net Zero by 2038 ("Net Zero refers to a state where the greenhouse gases going into the atmosphere are balanced by their removal out of the atmosphere.") and then be considering an environmental permit for an incompetent company to be burning waste 24 hours a day for 5 days a week?

You must heed the Government Inspector's advice, he spent hours upon hours going over everything with a fine tooth comb, something I'm sure you won't have the time or knowledge to be able to do.

The valley is no place for an incinerator at all, therefore I urge you to use common sense, listen to your community and vote NO.

Regards,  
XXXXX

319      Application for environmental permit for Schedule 13 small waste incinerator plant ref: S13/006

To whom it may concern,

I would like to register my objections to the request to install a small waste incinerator at Calder Valley Skip hire, Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.

I am concerned about the impact it will have on mine and my families health. We already have problems with the air pollution from the existing site which is positioned in the very bottom of the valley surrounded and enclosed by large trees.

A previous fire at the site caused us to feel ill due to the smell and we had to close all the windows in our home. The smoke and smell lasted for days, spreading from one end of the valley to the other. It lingered in the valley and then spread upwards affecting the surrounding areas as it was the only way it could disperse.

If this incinerator is to operate 24 hours a day and burn 10,000 tons of waste a year we could potentially find the same thing happening again, leading to further air pollution which would affect everyone living in the surrounding areas.

The previous application was refused following a Government inspection, finding. The waste gases would not be able to be discharged without being able to safeguard human health and the environment. So what has changed as the site is in the same place and the trees are still there? The weather impacts on the area too, as we get mist which regularly lies in the valley prohibiting the waste gases to disperse.

As I understand it this application has removed the right for the local councils ability to monitor compliance if the incinerator were to be operated. Leaving the owners to do what they want without any repercussions. This is unacceptable.

Sowerby Bridge has enough issues with traffic pollution. If the incinerator is allowed it will no doubt create further air pollution issues. The council are readying to improve Wharf Street and pumping public money in to do it, it will be a pointless exercise and waste of money if the incinerator goes ahead, creating further unnecessary air pollution.

There are schools, homes, cricket and rugby fields within a short distance of the site, to name but a few. The impact on



residents, children, those attending public events, walkers and canal users could create further health issues impacting on our already overloaded Doctors and hospitals. It could also stop tourists from coming to the area if they were made aware of the poor air pollution.

I strongly object to this request and hope planning permission is refused.

Regards  
XXXXX

320 I object to the planning of an incinerator in the Ryburn Valley.

Regards,  
XXXXX

321 Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,

XXXXX

322

Subject: Objection to Calder Valley Skip Hire application for an Environmental Permit

I want to register my objections to Calder Valley Skip Hire's Application for an Environmental Permit to operate a waste incinerator in Sowerby Bridge.

Having already failed to convince the Government Inspector to issue a permit because there was insufficient evidence that there would be no risk to the air quality and the safety of the operation, now with no further amendments and safeguarding procedures CVSH is applying again.

I live on the XXXXX at XXXXX, overlooking the valley which is often obscured by mist, which hangs in the valley bottom, held by steep sided hills. The plume from the incinerator would only add to any mist, hanging in the air over the site before heading down the valley towards the town centre and the rest of the Calder Valley, in the prevailing wind.

According to the Government website, the incinerator site is on a flood plain:

"The area around Calder Valley Skip Hire Ltd, Sowerby Bridge, HX6 3LL has a: high risk of surface water flooding medium risk of flooding from rivers."

The site has a wall next to the river, but this is breached on site to allow surface water flooding to escape the site and flows into the river Ryburn. What happens if the incinerator building is flooded and the flood water enters the river, before then continuing down stream to join the Calder, which is already one of the most polluted rivers in the country?

There are hundreds of houses on the valley sides, around the CVSH site, along with several schools all with playgrounds and Playing fields, will the children be safe playing out or playing games?

There are no automatic weather stations in the vicinity, only a manual one, in Copley. Who can tell where, when and how much pollution, or otherwise, is being produced and where it will go? Who will monitor the operation of the site, any pollution or discharges, air quality and what is actually being incinerated? Can CVSH be trusted since they seem to disregard everything that has gone before? Why has CVSH been allowed planning permission and then applied for an Environmental Permit when both should be considered together. How can Councillors be allowed to abdicate their duty and hand such an important decision to one individual, rather than the Democratically Elected Members in full Council?

Yours sincerely, XXXXX

Sent from my iPhone

323	<p>Good Morning,</p> <p>Please count my voice (on behalf of my family, 2 children and my husband) as an objection regarding the incinerator. We do not agree for building this in our residential area, between houses, schools, businesses etc. What a crazy idea is that, who's benefit would that be, I'm sure local people won't benefit.</p> <p>Thank you, XXXXX</p>
324	<p>I am writing to object to the Silverbridge incinerator plan due to the adverse effect it will have on local residence health. It's also in the bottom of our Valley which means that the smoke and residue from it will not blow away. It's absolutely in the wrong place Kind regards XXXXX</p>
325	<p>As a resident living XXXXX miles from Calder valley Skip Hire site, I object to the application by Calder Valley Skip Hire for an Environmental Permit to operate a waste incinerator on land below Rochdale Road in Sowerby Bridge.</p> <p>An earlier application was refused at appeal on 5th July 2023 by a Government Planning Inspector. He stated he was 'unable to find that waste gases from the incinerator would be discharged in a controlled way to safeguard human health and the environment.'</p> <p>The siting of the incinerator in the valley bottom means the polluting emissions from the plant chimney would be at the level of the surrounding residential areas of Sowerby Bridge and the woodlands on the northern side of Norland Moor. The area already suffers from poor air quality due to the heavy traffic use on the main road from M62 into Halifax. The valley often suffers from inversion which prevents polluting gases from dispersing.</p> <p>Importance of clean air for a healthy environment is clear from countless scientific studies. An application that has been rejected on appeal due to its significant polluting of the environment and health risks should not be passed on a resubmission.</p> <p>XXXXX</p>

326

Good morning,

I wish to object to the proposal that Calder Valley Skip Hire could be granted permission to run an incinerator in Sowerby Bridge.

The health risks to the community in our local are are far too high. Calder Valley skip hire started as a small enterprise and has far outgrown its premises and capability in its current location. An incinerator would only add to this situation.

Polluting gases from the chimney will linger in the valley, affecting all properties. There are 9 schools within 1 mile and 18 schools within 2 miles of the chimney. There is also a public footpath / right of way that runs close to the site.

The model data used for dispersal of gases is from a completely different location, not Sowerby bridge and the location did not have a steep valley like the Ryburn valley. The wind will blow the pollution down the valley affecting other residents. Mist and smoke tends to hang in the valley bottom on non windy days, intensifying the local problem.

Are Calder valley skip hire responsible enough to run the facility correctly, given evidence of recent fires?

This application should be refused given the disastrous impact it will have on air quality and health for thousands of residents in the Ryburn valley.

Regards  
XXXXXX

327

Dear Sir / Madam

I would like to raise an objection to Calder Valley Skip Hire's application for environmental permit for schedule 13 small waste incineration plant, ref S13/006.

I live almost across the road from the site, and as previously mentioned, it is just too low in the valley for such a site.

This has been raised and the application declined on so many occasions. A decision was already reached, to decline the application, so please let it stay that way.

Regards  
XXXXX

328 Dear Sir/Madam,

I wish to express my objection to the application for an incinerator at Belmont Industrial Estate in Sowerby Bridge by Calder Valley Skip Hire.

Firstly in my opinion it is a most unsuitable location for this kind of facility, in the bottom of a steep sided valley, close to residential areas, which are already subject to high levels of pollution from traffic using the busy A58 where standing traffic is a twice daily occurrence.

An application for an incinerator at this location has already been refused last summer, after a lengthy appeal by the applicant, and I find it concerning that they are able to apply again for this permit. Surely all the evidence provided for the refused appeal is still relevant and this facility still poses a health risk to local residents, visitors and employees working in this area?

I urge you to refuse this application once again for the sake of our health and that of our children going forward.

Yours faithfully,

XXXXX

329 To whom it may concern,

I would like to make an objection to the incinerator application at Belmont on these grounds.

1. The computer model is flawed as the weather detail is not consistent with the local conditions.
2. The application has already been denied by our local council and a government appointed inspector.
3. The council committee members are abdicating responsibility and passing it on to unelected planners.

Yours Faithfully XXXXX

330 To whom it may concern

Please note my strong objection to the proposed incinerator at sowerby bridge as a resident of the area.

This has been turned down numerous times with good reason and it is insanity that it is once again proposed.

I object on a number of levels:

The impact on the already poor air quality in this valley will impact respiratory health on not just the immediate community but those living and working and going to school in the Ryburn valley and surrounding villages. The smoke and waste will not disperse and will sit in the valley on some days.

The density of traffic on this road is already high with the current industry and will be increased greatly with the incinerator. This road has been badly damaged by large vehicles from the recycling plant which has caused untold damage to cars. This road cannot take more traffic.

Picking a suburban area is not suitable for a process that will occur 24 hours a day 5 days a week. The noise disruption will be unacceptable.

Please say no to sowerby bridge incinerator.

Yours hopefully  
XXXXX



331 Dear Sirs,

I write to inform you that as a resident of Sowerby bridge that I firmly object to the proposed installation of a waste incinerator on Rochdale Road in Sowerby Bridge. I was under the impression that when the matter was refused at appeal that this was the end of the matter. However, it now appears that the goalposts have moved and the council is not prepared to take a vote on the matter but asked Council Officers to decide. This does not appear to be a democratic approach and is very concerning.

Please note my objection on the basis that this is very clearly not going to be good for the air quality in our local environment and with the Council's inability to monitor this, is even more alarming.

Please acknowledge safe receipt and provide me with further information on the number of objections you have received and the process the Council Officers will undertake when making their decision.

Yours faithfully

XXXXX

332 Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,  
XXXXX

- 333 To whom it may concern,  
After reading concerning details about the reapplication to build an incinerator in Sowerby Bridge I must add my voice to the thousands of others and will you not to let it go through.  
It's staggering that after all the efforts to get this blocked the first time round that it has appeared again in what appears to be a much more subliminal way and in such a way that seems to bypass the levels it had to go through the first time round.  
We deserve to breathe clean air. This is a place I want to bring life into and the information on the incinerators potential harm to humans and the environment is at best unhealthy, at worst disastrous. This is not how the country hits its environmental targets and it must not be allowed to pass. With all my heart, please do not let this go through. It was thrown out for a reason.  
Yours sincerely,  
XXXXX
- 334 Dear Sir/Madam,  
I write to register my objection to the application by Calder Valley Skip Hire for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.  
In July 2023 a Government Planning Inspector refused the application due to concerns about the discharge of waste gases and their risks to the health of local people and the environment.  
All elected representatives of the people have opposed this application which reflects strong local objections who consider breathing clean air is a basic right that should be protected and reinforced by public officers.  
It is apparent that polluting gases should not be dispersed above the level of houses along the steep sided valley and in winter cold air will trap pollutants and affect all people in the valley. There are 18 schools within a 2 mile radius of the proposed chimney. These schools are above the height of the chimney and will suffer the polluting effects. Calderdale already has the highest rate of respiratory tract infections in West Yorkshire for infants in 2016 and asthma admissions in 2019. The community does not need additional pollution.  
Ryburn Valley Skip Hire cannot be trusted to operate the incinerator in accordance with government regulation as their application is flawed. Their proposal data used a weather station at a windswept Leeds Bradford airport to show that gases will be dispersed. Nothing like the proposed site with nothing like the weather conditions and geography of the airport and so cannot be relied upon. They have had problems with their current operation with several fires having broken out. Also being in the valley bottom there is risk of flooding. CVSH is aware of this risk and so applied using a postcode that is not registered as a flood risk area. Bearing this in mind, it is no wonder that in the latest application that the council's ability to request site diaries and inspection records to monitor compliance with regulations, has been removed.

Please refuse this application as the risk to community health is too high.

Regards,  
XXXXX

335 Dear Calderdale MBC Environmental Health,

I am writing to strongly to object the Calder Valley Skip Hire's application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge. The application has been resubmitted despite the original proposal being refused at appeal in July 2023 by a Government Planning Inspector. The reasons for refusal were concerns about the discharge of gases and the protection of human health and the environment.

Sowerby Bridge is already suffering from pollution issues and is an Air Quality Management Area to reflect this. Having the incinerator with smoke and emissions regularly affecting the valley bottom is unacceptable. It is doubtful that the air quality models presented by CVSH reflect local weather patterns and the inversions that can trap pollutants in this particular area.

Furthermore, this new application removes the ability of the Council to request site diaries and inspection records to monitor compliance rendering transparency and oversight impossible. All elected representatives from all parties have opposed this application, reflecting their constituents' wishes.

Please listen to the residents and reject this incinerator application once again. Breathing clean air should be a right that is protected and the threat to health posed by this application is quite simply too high.

Thank you.

Kind regards,

XXXXXX

336

To whom it may concern

I would like to formally object to the proposed plans to let an incinerator at calder valley skip hire in sowerby bridge. I believe this would pose a significant risk to health for those who live in the valley. It is not a suitable location for the incinerator, with it being positioned within tree coverage at the bottom of the valley, very close to both housing and businesses.

I do hope this plan will be again refused, and preferably not allowed to apply again.

Yours sincerely

XXXXX

337

I exercise my rights once again to voice my objections to the planned Incinerator at Sowerby Bridge Calder Valley Skip Hire plant.

Despite the previous application being refused at appeal by a Government Planning Inspector the local community find themselves once again in a position where the applicants have been able to resubmit a new application to the council, which they have accepted for consideration(?) which surely questions the whole process and legal recourse. How can an application that has already been voted out and refused previously get considered for application again?

I have multiple objections to the new application for the incinerator and these are listed below:

1. National and international agenda is on reducing carbon emissions in acknowledgement for the requirement to reduce global warming. Incinerators and burning rubbish is in direct contrast to this agenda to reduce carbon emissions. Sowerby Bridge is already suffering from pollution with smoke and mist regularly hanging in the unique geographical terrain of a steep sided, heavily wooded valley bottom with the River Calder running through the valley. During an accidental fire at the recycling plant several years ago smoke hung in the valley for days. Local primary schools were unable to play outside due to the poor air quality and had to keep windows closed. This would become 'the norm' if the incinerator were to go ahead. There are 6 primary schools within a 3 mile radius of the school ( 1200+ pupils) aswell as a secondary school (2000+ pupils) aswell a significant volume of residential housing. Consider the future pressures on the NHS as a result of the local population breathing excess levels of carbon emissions and developing respiratory and circulatory health issues.

2. Nationwide ( England) there are already sufficient numbers of incinerators to adequately cope with the volume/tonnes of rubbish that as a country we are incinerating. National agenda is on reducing volume/tonnes of rubbish being incinerated in favour of using cleaner, less carbon emitting methods of recycling our waste and Yorkshire as a County already have adequate existing incinerators to deal with the waste generated. Scotland and Wales already have a moratorium on the ban of using incinerators for waste disposal. The nationwide agenda should be to have a permanent ban on incinerators given they are proven to be unable to discharge waste gases in controlled way as to safeguard human health and the environment.

3. The existing site, being sited near to the River Calder which has flooded several times over recent years caused waste to be washed into the river downstream polluting the river course. Given there are inadequate fences and defences on the proposed site to prevent flood water from reaching incinerator and waste site this contamination of waste into the river would increase. The location and site for the incinerator chimney is quite plainly inappropriate.

4. The applicants theory and evidential support that the smoke dispersal from the plume not being any cause for concern is flawed. Using a computer aided model based at Leeds/Bradford Airport is in no way comparable to the terrain that the current site is located- steep sided wooded valley bottom. The smoke dispersal from the smoke plume, be it above or below the tree line, would cause smoke to hang in the valley bottom. The false belief that emissions into the atmosphere

would be diluted and dispersed is inaccurate. Carbon gases from emissions from an incinerator are heavier than air. Sooner or later they fall to the ground, turn into Nitric Acid or Ozone Greenhouse gas. On cloudless, windless days emissions will fall to the ground near the source and with wind the emissions will still exceed safe levels and fall to the ground elsewhere but still nearby in a populated area.

5. Noise levels and excess traffic. The current site is located in an inhabited and significantly populated valley bottom and current activity from the recycling plant can already be heard by households living nearby at all hours and through the night. The proposal to operate 24 hours a day, 5 days a week processing in excess of 10,000 tons of waste per year will have massively detrimental impacts onto the schools, households and other businesses operating in the area. The already congested A58 Rochdale Road which suffers from traffic congestion will be further exacerbated with the volume of lorries carrying waste to and from the site (proposals of up to 120 lorries per day)

I sincerely hope that the points raised will be considered by a fair and impartial committee of persons within the Council and not swayed, incentivised or intimidated by parties in favour of applicants proposals without fully understanding the health and environmental implications to the area of granting applicants an incinerator license.

Regards

XXXXX



338	<p>To whom it may concern</p> <p>I would like to formally object to the proposed plans to let an incinerator at calder valley skip hire in sowerby bridge. I believe this would pose a significant risk to health for those who live in the valley. It is not a suitable location for the incinerator, with it being positioned within tree coverage at the bottom of the valley, very close to both housing and businesses.</p> <p>I do hope this plan will be again refused, and preferably not allowed to apply again.</p> <p>Yours sincerely XXXXX</p>
339	<p>I feel very strongly that the proposed incinerator should NOT be allowed to open in Calderdale. As a person with Asthma, I don't want any more pollution in West Yorkshire.</p> <p>Concerned local person XXXXX</p> <p>Sent via BT Email App</p>
340	<p>I would like to register my objection to the renewed application for a permit to operate a waste incinerator in Sowerby Bridge.</p> <p>Calderdale Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience. The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 which was the decision of a judicial review.</p> <p>This application should be turned down once and for all. It will greatly affect air quality in an environment where many thousands of people live, work and go to school. The only people to benefit if this is allowed to go ahead is one privately owned company. A business shouldn't ever be more important than the health of thousands of people.</p> <p>Kind regards  XXXXX</p>

341

Sirs

I wish to object to the above application for a permit to operate an incinerator at Cvsh Belmont site in Sowerby Bridge for the following reasons

1/ There is no safe limits to micro particulates and dioxins produced by incineration. The devolved governments of the UK other than England have banned all further incineration applications on this basis.

The permit would allow 10,000 tons to be incinerated per year by the plant operating 24 hours per day, 6 days per week- the effect on local air pollution will be significant.

2/ There are 7 schools in the immediate vicinity of the Belmont site. These range from infant to 6th form. Any incinerator use would effect 2600 children who will be exposed to severe air pollution for the entire school year. This will put their health at serious risk.

3/ The Cvsh Belmont site is situated in a narrow steep sided valley which is subject to regular inversion of temperature events when air and air pollution is trapped in the valley making air pollution likely to increase significantly during these events- the last one was approximately 3 weeks ago.

4/ Traffic issues - the large amount of waste to be incinerated will result in a significant increase in Hgv traffic to the Belmont site over and above the current high rate of traffic to the site increasing both vehicle pollution and road safety. Queuing Hgvs on the main road is already causing traffic congestion which can only increase. The existing traffic turning into the Belmont site is damaging the road surface outside the entrance and this will only get worse, endangering all road users.

5/ Lack of Democratic decision making

The decision to grant the application will not be made by Calderdale elected councillors but by unelected council officers. Is this legal? Certainly this would make a mockery of local democracy if the application is approved.

6/ Oversight of Cvsh if incineration is permitted.

I understand that there will be minimal or no oversight as to what materials would be incinerated. Potentially Cvsh could burn whatever they wished so that air pollution would be much worse than Cvsh has proposed in their permit application.

7/ last year effectively the same application for a permit to operate was refused by a government inspector. Cvsh did not appeal.

So why a new application. No salient facts have changed.

I hope and expect for all the above reasons that the application be refused once and for all and that Cvsh be made to remove all the incineration equipment immediately. I suspect that this equipment is currently in use without a permit.

XXXXX

I live in XXXXX and am happy to supply my address if required.

Sent from my iPhone

342 Dear sirs,

I write in relation to the renewed application for a permit to operate a waste incinerator at Belmont and to register my objection to such application.

There is no justifiable reason to grant the application particular when consideration is taken to the additional pollution it would cause especially given the location being near by a residential area. Allowing the application to go through would clearly be contrary to the UKs binding carbon emission reduction commitments as well as posing a serious health risk to residents.

In considering the application full weight should be borne to any and all environmental and health implications and as such the Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets and there are numerate reports and evidence to back this up.

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Yours,

XXXXX

343 Dear Sir/Madam

I am writing to wholeheartedly object to the above application (S13/006) by Calder Valley Skip Hire (CVSH) for an Environmental Permit to operate a waste incinerator at their site on Rochdale Road, Sowerby Bridge.

This application is a resubmission of a previous application which was refused in July 2023 by John Woolcock, Government Planning Inspector. The reasons for the consistent refusal of CVSH applications over the last eight years are still well founded and valid. The huge number of public objections received by Calderdale Council over this period are also still well founded and valid. Granting CSVH an Environmental Permit to burn 10,000 tons of waste a year for 24 hours a day, five days a week would add hugely to the air pollution issues Sowerby Bridge already has to contend with.

It is also extremely worrying that this new application significantly removes Calderdale Council's ability to monitor compliance in the operation of aforesaid incinerator should a permit be granted to CVSH.

Sowerby Bridge is in an Air Quality Management Area - we definitely do not need any further unnecessary contribution to air pollution levels - we should be striving to cut down the levels of air pollution and certainly not further adding to them. This incinerator would, undoubtedly, significantly impact our air quality, as reported by the Government Planning Inspector in 2023 - nothing has changed - the permit was refused in July 2023 for these reason and it should be refused again now.

We need to safeguard our health and environment - breathing clean air should be a basic right of any community and to that end, I am asking Calderdale Council to do the right thing and refuse this application on the same grounds as it was refused in July 2023.

Yours faithfully

XXXXX

344

Sirs

I wish to object to the above application for a permit to operate an incinerator at Cvsh Belmont site in Sowerby Bridge for the following reasons 1/ There is no safe limits to micro particulates and dioxins produced by incineration. The devolved governments of the Uk other than England have banned all further incineration applications on this basis.

The permit would allow 10,000 tons to be incinerated per year by the plant operating 24 hours per day, 6 days per week- the effect on local air pollution will be significant.

2/ There are 7 schools in the immediate vicinity of the Belmont site. These range from infant to 6th form .Any incinerator use would effect 2600 children who will be exposed to severe air pollution for the entire school year. This will put their health at serious risk.

3/ The Cvsh Belmont site is situated in a narrow steep sided valley which is subject to regular inversion of temperature events when air and air pollution is trapped in the valley making air pollution likely to increase significantly during these events- the last one was approximately 3 weeks ago.

4/ Traffic issues -the large amount of waste to be incinerated will result in a significant increase in Hgv traffic to the Belmont site over and above the current high rate of traffic to the site increasing both vehicle pollution and road safety. Queuing Hgvs on the main road is already causing traffic congestion which can only increase. The existing traffic turning into the Belmont site is damaging the road surface outside the entrance and this will only get worse ,endangering all road users.

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I understand that there will be minimal or no oversight as to what materials would be incinerated. Potentially Cvsh could burn whatever they wished so that air pollution would be much worse than Cvsh has proposed in their permit application.

7/ last year effectively the same application for a permit to operate was refused by a government inspector. Cvsh did not appeal.

So why a new application? .No salient facts have changed?

8) In addition to the above as a more general observation, the area adjoining the CVSH Belmont site is a wildlife corridor for local fauna including deer and herons.

9) There is also potential for flooding on the Belmont site which poses a real threat of contamination of the site and local

area downstream

10) I am concerned the incinerator will pose a threat to the successful TV and Film industry in the area.

I hope the application will be refused to bring to an end the many attempts to inflict an outdated and discredited method of dealing with waste on the locality.

XXXXX

Sent from my iPhone

345 A Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours faithfully  
XXXXX



345B Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

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The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours faithfully  
XXXXX

346 To whomever it concerns

I would like to register my objection to the renewed application for a permit to operate a waste incinerator in Sowerby Bridge.

Calderdale Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience. The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 which was the decision of a judicial review.

This application should be turned down once and for all. It will greatly affect air quality in an environment where many thousands of people live, work and go to school. The only people to benefit if this is allowed to go ahead is one privately owned company. A business shouldn't ever be more important than the health of thousands of people.

I work at a manufacturing site in Sowerby Bridge and we are continually improving to protect the environment and work towards sustainability to protect the future and health now and long term. How can such an idea get approved especially in such a closed valley bottom where we are lucky to have such fresh air.

Best Regards

XXXXX

347 Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

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The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours faithfully  
XXXXX

348 Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

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The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,  
XXXXX

349

Hi,

As someone who lives near to Sowerby Bridge, I am deeply concerned about the plans to go ahead with the incinerator project despite the rejected application, and significant objections from residents, community groups, local councillors, local MPs and experts. Sowerby Bridge is already suffering from pollution, and increasing waste gases into the valley is putting business interests above the health and wellbeing of residents, as well as decreasing local trust in our council and political process.

Regards,  
XXXXX

350

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,

XXXXX

351 To whom this may concern

I am a local house owner and resident on XXXXX proposed incinerator site Calder valley skip hire.

We as a family live on XXXXX and have the constant noise from the industrial park rose hill polymers and the other businesses in the valley. We have accepted the noise from the industry but we are very concerned about the possibility of an incinerator in a same location.

Sowerby bridge was renowned for the air contamination when the mills and industry was at its peak, the valley held the bad air in its basin and it often still demonstrates in the winter how the air settles in the base when you see the clouds in an early morning. Surely it is an indication of how the fumes from the incinerator will settle around our houses and drift through the residential areas , town centre and schools

The area around our house is green belt and home to a lot of wildlife and an area of beauty and history, leading down to the dismantled railway towards Ripponden. I myself have chickens and dogs and enjoy seeing the wild deer, woodpeckers, a huge selection of birds and the local horses in the area. The incinerator will damage the clean air that promotes all of the wildlife and will threaten the area considerably.

Our house price is likely to be effected and will in the future possibly be deteriorated.

I have objected to the development in the past and I will continue to do so. The calder valley skip hire has already contaminated the river when a skip floated down in flood, both with the physical damage and chemical damage the refuge creates.

I hope the local residents opinions are not again ignored and even though it has been rejected time and time again we have to go through the same turmoil that we have to go over and over.

Regards

XXXXX

352 To whom it may concern,

With reference to Calder Valley Skip Hire Limited – Calderdale planning S13/006.

I hope this email finds you well. I am a concerned resident of Sowerby Bridge, writing to express my strong objection regarding the proposed Environmental Permit for Calder Valley Skip Hire Limited to construct an incinerator, as outlined in planning application S13/006.

It saddens me to reflect that my first objection to Calder Valley Skip Hire's incinerator plans was voiced when I was just XXXXX years old. Seven years have passed since then, and yet, here we stand again, facing the same threat to our community's well-being. This cycle must come to an end.

As highlighted by the United Nations Environment Programme, incinerators are the leading source of dioxin in the global environment. This leads to increased health risks, including reproductive complications, developmental issues, and immune system disorders. They have also been shown to disrupt hormones and lead to cancer. At a time when our National Health Service is under immense strain, it begs the question: why is the notion of introducing such a hazardous facility into our vicinity still up for debate?

The incinerator is to be placed a mere 670 meters away from Sowerby Bridge. Attached to this email, you will find photographs capturing the ominous reality of smoke engulfing our valley during past incidents involving fire. As you can see, the smoke does not dissipate. There are 12000 people living in Sowerby Bridge, along with two primary schools, 2 secondary schools, two nurseries, a park, but most importantly, a town situated in a steep sided valley which cannot escape the pollution. Why, as a council, do you find it acceptable to still give Calder Valley Skip Hire the opportunity to interfere with our health?

Sowerby Bridge is already incredibly polluted, given it is an area which has been identified to already have spoilt air quality due to car pollution. The government inspector stated that, "given the height and proximity of the smoke stack to trees and woodland, he was unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment." Despite these clear warnings regarding the potential hazards posed by this project, the persistence of Calder Valley Skip Hire demonstrates their total disregard for both human health and environmental preservation. We should be looking at ways to reduce pollution, not ways to make it worse.

I implore you, as representatives of our community's interests, to take decisive action in ending this once and for all. It is imperative that we prioritize the health and safety of our residents over corporate interests.

I remain hopeful that this will be my final email on this matter, and that together, we can safeguard the well-being of our community for generations to come.

Kind regards,  
XXXXX



353

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,  
XXXXX

354

To whom it may concern,  
ENVIRONMENTAL PERMIT APPLICATION, CALDER VALLEY SKIP HIRE  
LTD: REF: S13/006

I am writing again regarding the latest application for an environmental Permit for the operation of a Small Waste Incinerator Plant (SWIP) at Calder Valley Skip Hire's Belmont site. We wish to object to this latest application in the strongest possible terms.

I am extremely concerned about the environmental impact the incinerator would have at this location and call on the council to refuse the application. In particular, I wish to note the following points:

#### Inability to Enforce Permit Conditions

The new application operations on the Belmont site would be governed by two separate permits, one relating to the SWOP and the broader EA permit. When CVSH applied for a permit for a site at Mearclough, Calderdale's Cabinet refused this, citing "concerns about the enforceability and any related concerns in a situation where operations on the site are governed by two separate permits; Having considered both legal advice and information from Defra, it is concluded that there is insufficient certainty about the ability of the council to enforce permit conditions...". This argument applies equally to the situation at Belmont, and therefore the Permit should be refused.

#### Impact on Air Quality

The site is wholly unsuited for the burning of waste, being in a steep sided, heavily wooded, densely populated valley, very close to an Air Quality Management Area (AQMA) as well as being within 2km of a dozen schools. Recreational areas, homes and businesses are all within the immediate vicinity. The air quality through the nearby Sowerby Bridge town centre is already very poor, with levels of pollutants regularly exceeding lawful limits. There is evidence to suggest that the operation of the incinerator would exacerbate the pollution problem in the valley, with an increase of NOx and small particulate matter, which would worsen the health of local residents. Indeed, in his judgement of 5th July 2023, Inspector John Woolcock concluded:

“ Taking all the above into account, I consider that the appeal should be dismissed because I am not satisfied on the evidence adduced that the proposal complies with IED Article 46 1., which requires that waste gases from waste incineration plants and waste co-incineration plants shall be discharged in a controlled way by means of a stack the height of which is calculated in such a way as to safeguard human health and the environment. Furthermore, I am unable to find that the necessary measures have been taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

The incidence of lung disease in Calderdale is notably higher than the rest of West Yorkshire, and around 4.5% of all adult mortality in Calderdale is estimated to be due to the long term exposure to harmful particulate air pollution. The borough ranks amongst some of the worst local authorities in the country for premature death rates due to respiratory disease.

The council has a duty to work to reduce air pollution, and therefore should not grant an application that may well worsen the problem. When Calderdale Council refused the Mearclough application in 2018, the reasons for refusal stated: It is accepted that there is no safe level of NOx and it is accepted that the SWIP site could impact on an AQMA. The application does not provide reasonable grounds to believe that it will not lead to an increase in NOx levels within the locality, but again there is no certainty that any action could be taken in the event of a breach.” The Belmont site is equidistant to the Sowerby Bridge AQMA, and therefore this statement applies equally to the current application as to the former.

#### Health Impacts

Dioxins are produced when burning Refuse Derived Fuel (RDF) and are described by the World Health Organisation (WHO) as “highly toxic and can cause reproductive and developmental problems, damage the immune system, interfere with hormones and can cause cancer”. Dioxins are classified as Persistent Organic Pollutants and any analysis of potential receptors

should include local businesses such as the Sowerby Bridge Day Nursery which is just down-stream from CVSH.

#### Flooding

The Calder Valley Skip Hire site at Belmont is situated adjacent to the River Ryburn, and has suffered flooding on numerous occasions. The Government's Flood Risk Checking Service shows:

The area around Calder Valley Skip Hire Ltd, Sowerby Bridge, HX6 3LL has a:

high risk of surface water flooding

medium risk of flooding from rivers and the sea

There is insufficient evidence to suggest that this flooding can be either eliminated or adequately mitigated. Any potential flooding of the site, which is possible from both surface water and river flooding, could be disastrous for the river and its ecosystems. Furthermore, we understand the flood bund, which CVSH installed on the site along the riverbank following a previous flooding incident, has a gap to allow surface water to leave the site. This would surely render it ineffective in the event of a flood incident involving raised river levels.

#### Insufficient data modelling

The applicant has used evidence from two sets of computer-modelling to support the application. One model shows the temperature distribution and residence time within the combustion chamber in order to show that a high enough temperature is reached for long enough to reduce dioxins, furans and particulates within the gas flow to acceptable levels for the emissions. A

second computer-modelling programme is used to simulate the dispersion of those emissions. In both cases these models only show results for a prescribed set of input conditions. They do not represent real world conditions which are variable and subject to abnormal or unforeseen events.

The combustion modelling is also based on typical Refuse Derived Fuel (RDF) waste composition. This requires careful sorting and segregation which relies on human intervention to obtain the correct mix of materials. The actual RDF is likely to have significant variations, thus rendering the combustion

modelling unreliable.

In addition, Inspector Woolcock noted in his report:

9. Because of an error at the planning application stage in the AOD of the proposed stack, a previous run of the model inadvertently assessed a stack height 9 m higher than the correct discharge height.<sup>40</sup> The results from this modelling do not provide any reassurance about the robustness of the stack height calculation now relied upon by the appellant because that run of the model also dealt with the trees solely by means of surface roughness length.

#### Weather Statistics

Weather data has been used for the dispersion modelling. The data used has come from Leeds Bradford Airport and Bingley. Leeds Bradford Airport is 20 miles away, and at an elevation of 208m it is England's highest airport, with a totally open aspect in all directions. The site of the proposed incinerator, in a heavily wooded, narrow valley bottom is not comparable in any way.

We would therefore argue that this renders the dispersion modelling analysis invalid.

In addition, the local topography is such that predicting dispersion in the bottom of a narrow valley is extremely complicated and normal dispersion rules do not apply. The incinerator lies in the shadow of Norland Moor which is at 280m elevation and causes a unique set of conditions. Dispersion is further complicated by the height of trees surrounded by the site.

The Ryburn Valley is known locally for its Inversions, which cause low-lying cloud to remain in the valley for hours and sometimes days. During the fire on the CVSH site in 2017, the smoke lingered for several days. This gives a clear illustration of the effects of smoke in the valley, and it is reasonable to assume that any fumes from the incinerator would behave in the same way.

#### Environmental Impact:

According to UKWIN (UK Without Incineration Network), a national crossparty group who are calling for a moratorium on all new incinerators in England (Scotland and Wales having already passed such a moratorium), every tonne of waste that is incinerated emits one tonne of carbon dioxide into the atmosphere, approximately half of which is derived from fossil fuels.

In addition, the UK already has more incinerator capacity than it needs, and in the vast majority of regions, more waste is sent to incinerators than is recycled. There is a clear comparison to be drawn between the rise of incineration rates and a decrease in recycling rates. The proposed incinerator would create a further capacity of 10,000 tonnes, which when burnt would release 10,000 tonnes of carbon dioxide into the atmosphere and would inevitably have an impact on recycling rates locally.

#### Competence of the Operator

The Council must refuse an application for an environmental permit if it considers that the applicant will not operate the regulated facility in accordance with the permit.

Unfortunately, Calder Valley Skip Hire has a poor relationship with its neighbours who allege that they have failed to abide by existing conditions resulting in hundreds of complaints. Council Officers had to intervene in 2015 after large stockpiles of waste accumulated on the Belmont site, causing a foul stench to linger throughout Sowerby Bridge. Furthermore, there was a large fire on the site in 2017, and smoke from this lingered in the valley for several days, as noted previously in our objection.

Guidance for Council Officers on the competence of an operator can include circumstances where the Council believes that the operator lacks the management systems or competence to run the installation according to the application or any permit conditions.

#### Conclusion:

We believe that the combination of insufficient data modelling, unreliable data used from inappropriate sources, and the concerns raised by Inspector Woolcock should be sufficient reasons to reject this and all subsequent applications for an environmental permit at this site.

Yours sincerely.

XXXXX

355 To whom it may concern,

I am taking precious time out to write about my objection to the application of a permit that Calder Valley skip hire have made. I have a disability that makes it difficult for me to engage like this, but I am so appalled that this has arisen again that I feel compelled to write as I have been unable to physically attend the meetings around this subject. Having lived in Sowerby Bridge for around 20 years I had hoped that we would be building towards cleaner air, yet I find that the air quality is to be challenged again by a permit for an Incinerator. A chimney that is to be placed in the Valley bottom and hasn't had a computer model that adequately represents the area, and is questionable on not being be tall enough or far enough away from surrounding trees to be definitely safe.

The valley is renowned for being a catchment area for smoke and fog in particular weather conditions. Overlooking the valley I can see the effects one simple bonfire has and how smoke easily builds up and cascades down the valley....not up and away as some people might think would happen if there are wind up-drafts. Already on certain days there is the smell of burning, dust and pollution which makes even hanging washing out unfavourable. Yet instead of driving towards making the air cleaner, suddenly it seems ok to add on top of this. I feel mostly sorry for the youngsters who have to grow up in this atmosphere, as if a gamble on incinerating rubbish is worth even a slight risk on their health. I also believe that the application no longer states that "Calderdale may request copies of the inspection records at any time". Not that I would be in favour of incurring extra costs to check that our health isn't being negatively effected by a private company, but even this safety check appears to have been removed. I can only hope that common sense prevails and the council are not willing to gamble on the health of the people in their Valley.

Yours, concerned,

XXXXX

356

Dear Sir/Madam,

I feel I must protest against the new application for the Sowerby Bridge Incinerator.

Why anybody feels it would be suitable in a built-up area and at the bottom of a valley is beyond me.

Quality of the air that we as locals breathe is a basic requirement for good health especially for our children.

Wildlife will also surely suffer along with the extra noise that this will bring, especially at night in summer when trying to sleep with windows open.

We all deserve to get a good night's sleep to be able to perform in our daily functions, be it at school or work.

Sowerby Bridge is already suffering from pollution so this proposal will make it even worse.

Valuations in our homes will also suffer and I especially feel for the people that have bought their homes as the first step on homeowners' ladder, who will find themselves losing money on their investment.

I have read that the new application has NOT included that CMBC will be able to request copies of the site diary and inspection records relating to SWIP operations at any time – this cannot be right.

The original application and appeal were refused for good reasons, please do your utmost to make sure this new application is also refused.

Thank You.

XXXXX

XXXXX



357

Hello,

I am writing to formally object to the incinerator that is planned for Sowerby Bridge by Calder Valley Skip Hire. As a Sowerby Bridge resident I believe that the incinerator will have a negative impact on the air quality in the town, and will have a detrimental impact on the local environment. This incinerator must not be granted an environmental permit.

XXXXX

358

We object to the waste incineration plant, this will affect homes, care homes, schools shops they are putting people at risk its dangerous, we absolutely say no.

XXXXX

359

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,

Kind Regards,  
XXXXX

360

To whom it may concern,  
ENVIRONMENTAL PERMIT APPLICATION, CALDER VALLEY SKIP HIRE  
LTD: REF: S13/006

We are writing again regarding the latest application for an environmental Permit for the operation of a Small Waste Incinerator Plant (SWIP) at Calder Valley Skip Hire's Belmont site. We wish to object to this latest application in the strongest possible terms.

We are extremely concerned about the environmental impact the incinerator would have at this location and call on the council to refuse the application. In particular, we wish to note the following points:

#### Inability to Enforce Permit Conditions

The new application operations on the Belmont site would be governed by two separate permits, one relating to the SWOP and the broader EA permit. When CVSH applied for a permit for a site at Mearclough, Calderdale's Cabinet refused this, citing "concerns about the enforceability and any related concerns in a situation where operations on the site are governed by two separate permits; Having considered both legal advice and information from Defra, it is concluded that there is insufficient certainty about the ability of the council to enforce permit conditions...". This argument applies equally to the situation at Belmont, and therefore the Permit should be refused.

#### Impact on Air Quality

The site is wholly unsuited for the burning of waste, being in a steep sided, heavily wooded, densely populated valley, very close to an Air Quality Management Area (AQMA) as well as being within 2km of a dozen schools. Recreational areas, homes and businesses are all within the immediate vicinity. The air quality through the nearby Sowerby Bridge town centre is already very poor, with levels of pollutants regularly exceeding lawful limits. There is evidence to suggest that the operation of the incinerator would exacerbate the pollution problem in the valley, with an increase of NOx and small particulate matter, which would worsen the health of local residents. Indeed, in his judgement of 5th July 2023, Inspector John Woolcock concluded:

“ Taking all the above into account, I consider that the appeal should be dismissed because I am not satisfied on the evidence adduced that the proposal complies with IED Article 46 1., which requires that waste gases from waste incineration plants and waste co-incineration plants shall be discharged in a controlled way by means of a stack the height of which is calculated in such a way as to safeguard human health and the environment. Furthermore, I am unable to find that the necessary measures have been taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

The incidence of lung disease in Calderdale is notably higher than the rest of West Yorkshire, and around 4.5% of all adult mortality in Calderdale is estimated to be due to the long term exposure to harmful particulate air pollution. The borough ranks amongst some of the worst local authorities in the country for premature death rates due to respiratory disease.

The council has a duty to work to reduce air pollution, and therefore should not grant an application that may well worsen the problem. When Calderdale Council refused the Mearclough application in 2018, the reasons for refusal stated: It is accepted that there is no safe level of NOx and it is accepted that the SWIP site could impact on an AQMA. The application does not provide reasonable grounds to believe that it will not lead to an increase in NOx levels within the locality, but again there is no certainty that any action could be taken in the event of a breach.” The Belmont site is equidistant to the Sowerby Bridge AQMA, and therefore this statement applies equally to the current application as to the former.

#### Health Impacts

Dioxins are produced when burning Refuse Derived Fuel (RDF) and are described by the World Health Organisation (WHO) as “highly toxic and can cause reproductive and developmental problems, damage the immune system, interfere with hormones and can cause cancer”. Dioxins are classified as Persistent Organic Pollutants and any analysis of potential receptors

should include local businesses such as the Sowerby Bridge Day Nursery which is just down-stream from CVSH.

#### Flooding

The Calder Valley Skip Hire site at Belmont is situated adjacent to the River Ryburn, and has suffered flooding on numerous occasions. The Government's Flood Risk Checking Service shows:

The area around Calder Valley Skip Hire Ltd, Sowerby Bridge, HX6 3LL has a:

high risk of surface water flooding

medium risk of flooding from rivers and the sea

There is insufficient evidence to suggest that this flooding can be either eliminated or adequately mitigated. Any potential flooding of the site, which is possible from both surface water and river flooding, could be disastrous for the river and its ecosystems. Furthermore, we understand the flood bund, which CVSH installed on the site along the riverbank following a previous flooding incident, has a gap to allow surface water to leave the site. This would surely render it ineffective in the event of a flood incident involving raised river levels.

#### Insufficient data modelling

The applicant has used evidence from two sets of computer-modelling to support the application. One model shows the temperature distribution and residence time within the combustion chamber in order to show that a high enough temperature is reached for long enough to reduce dioxins, furans and particulates within the gas flow to acceptable levels for the emissions. A

second computer-modelling programme is used to simulate the dispersion of those emissions. In both cases these models only show results for a prescribed set of input conditions. They do not represent real world conditions which are variable and subject to abnormal or unforeseen events.

The combustion modelling is also based on typical Refuse Derived Fuel (RDF) waste composition. This requires careful sorting and segregation which relies on human intervention to obtain the correct mix of materials. The actual RDF is likely to have significant variations, thus rendering the combustion

modelling unreliable.

In addition, Inspector Woolcock noted in his report:

9. Because of an error at the planning application stage in the AOD of the proposed stack, a previous run of the model inadvertently assessed a stack height 9 m higher than the correct discharge height.<sup>40</sup> The results from this modelling do not provide any reassurance about the robustness of the stack height calculation now relied upon by the appellant because that run of the model also dealt with the trees solely by means of surface roughness length.

#### Weather Statistics

Weather data has been used for the dispersion modelling. The data used has come from Leeds Bradford Airport and Bingley. Leeds Bradford Airport is 20 miles away, and at an elevation of 208m it is England's highest airport, with a totally open aspect in all directions. The site of the proposed incinerator, in a heavily wooded, narrow valley bottom is not comparable in any way.

We would therefore argue that this renders the dispersion modelling analysis invalid.

In addition, the local topography is such that predicting dispersion in the bottom of a narrow valley is extremely complicated and normal dispersion rules do not apply. The incinerator lies in the shadow of Norland Moor which is at 280m elevation and causes a unique set of conditions. Dispersion is further complicated by the height of trees surrounded by the site.

The Ryburn Valley is known locally for its Inversions, which cause low-lying cloud to remain in the valley for hours and sometimes days. During the fire on the CVSH site in 2017, the smoke lingered for several days. This gives a clear illustration of the effects of smoke in the valley, and it is reasonable to assume that any fumes from the incinerator would behave in the same way.

#### Environmental Impact:

According to UKWIN (UK Without Incineration Network), a national crossparty group who are calling for a moratorium on all new incinerators in England (Scotland and Wales having already passed such a moratorium), every tonne of waste that is incinerated emits one tonne of carbon dioxide into the atmosphere, approximately half of which is derived from fossil fuels.

In addition, the UK already has more incinerator capacity than it needs, and in the vast majority of regions, more waste is sent to incinerators than is recycled. There is a clear comparison to be drawn between the rise of incineration rates and a decrease in recycling rates. The proposed incinerator would create a further capacity of 10,000 tonnes, which when burnt would release 10,000 tonnes of carbon dioxide into the atmosphere and would inevitably have an impact on recycling rates locally.

#### Competence of the Operator

The Council must refuse an application for an environmental permit if it considers that the applicant will not operate the regulated facility in accordance with the permit.

Unfortunately, Calder Valley Skip Hire has a poor relationship with its neighbours who allege that they have failed to abide by existing conditions resulting in hundreds of complaints. Council Officers had to intervene in 2015 after large stockpiles of waste accumulated on the Belmont site, causing a foul stench to linger throughout Sowerby Bridge. Furthermore, there was a large fire on the site in 2017, and smoke from this lingered in the valley for several days, as noted previously in our objection.

Guidance for Council Officers on the competence of an operator can include circumstances where the Council believes that the operator lacks the management systems or competence to run the installation according to the application or any permit conditions.

#### Conclusion:

We believe that the combination of insufficient data modelling, unreliable data used from inappropriate sources, and the concerns raised by Inspector Woolcock should be sufficient reasons to reject this and all subsequent applications for an environmental permit at this site.

Yours sincerely,

XXXXX

361

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience. This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result. Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets. Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop? The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review. Please, for all our sakes and all our souls, do the right thing.

The ethical thing. The responsible thing.

Yours,

XXXXX



362 Re: Objection to Environmental Permit Schedule 13 for Small Waste Incinerator Plant Ref: S13/006

I am writing to strongly object to Calderdale Council granting an Environmental Permit (Schedule 13 for Small Waste Incinerator Plant) to Calder Valley Skip Hire ref: S13/006 on the following grounds:

1. This is a resubmission of an application dated 05/08/2020 which was refused at appeal on 05/07/2023 by Government Planning Inspector John Woodcock (The Government Inspector).
2. The Government Inspector said that given the height and proximity of the smoke stack to trees and woodland he was 'unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment'.
3. The ADMS computer model used as part of the submission does not use local weather data and as a result the flow of waste gases through the trees and valley can not be accurately predicted by the computer simulation. How can such an important decision be made without accurate and robust data on which to base the decision on?
4. Sowerby Bridge is in an Air Quality Management Area. Smoke and mist regularly lie in the bottom of the valley and inversion can stop waste gases dispersing - this can be seen on photographs after fires in the valley. This places further doubt on the validity of the air quality models submitted by the applicant which I understand is based on theoretical air quality modelling data.
5. This application omits an important section from the original application, that 'CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time'. How would the Council be able to monitor the applicant's compliance in operating the incinerator if the required evidence is not available?
6. The 'United Kingdom Without Incineration Network' (UKWIN) cites a number of reasons why incinerators are not a good idea, notably that incineration releases tonnes of CO2 into the atmosphere which exacerbates climate change and harms air quality. This application could burn in excess of 10,000 tonnes of waste a year. Granting an Environmental Permit will have a serious and significant (currently unmeasurable) impact on the health of the local population now and for future generations. It must not be allowed to go ahead.

Yours

XXXXX

363

Dear Sir/Madam

I am writing to wholeheartedly object to the above application (S13/006) by Calder Valley Skip Hire (CVSH) for an Environmental Permit to operate a waste incinerator at their site on Rochdale Road, Sowerby Bridge.

This application is a resubmission of a previous application which was refused in July 2023 by John Woodcock, Government Planning Inspector. The reasons for the consistent refusal of CVSH applications over the last eight years are still well founded and valid. The huge number of public objections received by Calderdale Council over this period are also still well founded and valid. Granting CSVH an Environmental Permit to burn 10,000 tons of waste a year for 24 hours a day, five days a week would add hugely to the air pollution issues Sowerby Bridge already has to contend with.

It is also extremely worrying that this new application significantly removes Calderdale Council's ability to monitor compliance in the operation of aforesaid incinerator should a permit be granted to CVSH.

Sowerby Bridge is in an Air Quality Management Area - we definitely do not need any further unnecessary contribution to air pollution levels - we should be striving to cut down the levels of air pollution and certainly not further adding to them. This incinerator would, undoubtedly, significantly impact our air quality, as reported by the Government Planning Inspector in 2023 - nothing has changed - the permit was refused in July 2023 for these reason and it should be refused again now.

We need to safeguard our health and environment - breathing clean air should be a basic right of any community and to that end, I am asking Calderdale Council to do the right thing and refuse this application on the same grounds as it was refused in July 2023.

Yours faithfully  
XXXXXX

364

I have noted with some concern that CVSH have submitted another application to operate an incinerator at their site on Rochdale Road. This seems to be a repeat of the previous application which was refused in July 2023 by the Government Planning Inspector so here are my grounds for objecting:

1. Why is another application even being considered when the previous decision wasn't appealed by the applicant? And why are the council wasting their time and our money dealing with the inevitable mountain of re-objections that are about to ensue?
2. Since the grounds for refusal last time were because of the height and proximity of the smoke stack to trees and woodland the government inspector was "unable to find that waste gases would be discharged in a controlled way to safeguard human health and the environment" and since the already-built stack is actually below the level of Rochdale Road, it would be a nothing short of a miracle if those waste gases aren't going to affect directly the air breathed in and around the locality.
3. Each ton incinerated equates to one ton of carbon dioxide released into the atmosphere. Perhaps this is why both Wales and Scotland have already banned any new permits. Will the council be insisting on carbon scrubbers being installed for example. Otherwise, they are basically applying to run a massive bonfire 5 days per week. Source: <https://ukwin.org.uk/facts/>  
With a request to burn 2000kg per hour, this is roughly the carbon dioxide equivalent of running 2000 5kW log-burning stoves continuously. What are the council's plans for offsetting this and capturing the wasted heat?
4. Equally, hoping to use a computer model for what is a unique (for incinerators) valley location based on data collected from a weather station some 20 miles away in a totally different topographical area would seem to be folly, unless of course there was some advantage to be had by the applicant. Naturally, as per the recent Horizon/Fujitsu case, any future case involving discounting of the risks involved would be laid at the door of the decision makers who will almost certainly be proven to have inadequately "safeguarded human health and the environment". Whatever legal threats have been made by CVSH, a crowd-funded class action at some future date would be much costlier to the council.
5. The frequent valley inversions would effectively channel the gases directly into Sowerby Bridge town centre ensuring a toxic smog in concentrations far above any legal limits
6. I strongly object to the council handing responsibility for monitoring emissions directly to CVSH themselves, effectively

marking their own homework. This is a company with a proven track record for disregarding existing operating conditions under which they were originally given planning for their recycling business. Specifically a one-way operation with no reversing beepers was not implemented and the skip chains are not sleeved as per the original planning conditions. Nor is the bund constructed to design.

With a government target of 16 million tons of incinerator capacity, reducing to 11 million, and with existing over-capacity of 20 million the necessity to provide even more over-capacity is puzzling too. Since there are more jobs in recycling, this seems like an ideal way to create unemployment at the expense of local people's health

365

I write to object strongly to the proposed Incinerator on the Belmont site in Sowerby Bridge.

I am shocked that the previous decision to refuse permission by the Government Planning Inspector on the grounds of air pollution can now be challenged by the Calder Valley Skip Hire CVSH. Air pollution is highly likely to be created by the discharge from the chimney. CVSH have submitted as their evidence a computer model of the flow of waste gases which is based on weather data from Yeadon/ Leeds Bradford Airport which is a very long way from the site and totally irrelevant since the landform at both sites is completely different. The Inspector found that waste gases could not be shown to be discharged in a controlled way so as to safeguard human health. Sowerby Bridge is already highly polluted with air quality a danger to health, particularly in children. The chimney stack is below the level of 18 schools within 2 miles, and below residential properties. The potential plume can be shown to be in any direction from the chimney, not just along the valley. There is evidence that gases from the chimney will not disperse quickly as mists regularly collect & remain at the bottom of the valley due to temperature inversion and photographs of smoke from fires from the waste recycling on the site ( also operated, apparently badly, by CVSH ) showed that the smoke did not disperse. Is Calderdale about to make the area: Sowerby Bridge, the Calder Valley to Mytholmroyd & the Ryburn Valley to Rpponden & beyond, a great deal worse ? How would we forgive our elected representatives, all of whom apparently oppose the application.

There is already an oversupply of incinerators nationwide. We should be recycling waste not burning it.

The case is beset with procedural and legal technicalities which run counter to the principle of democracy. How can it be right for the Council to pass such an important decision on to their environmental health officers. It seems to rest on the decision by the Council's legal team, presumably on the grounds that the cost of a potential appeal by CVSH would be unaffordable. So our future is to be won or lost on whoever has the deepest pockets. How is this democracy ? Councillors can't pretend that they were not responsible for the decision simply by giving it to one or two officers, probably not expert in air quality issues, to decide.

The new application by CVSH does not include methods of monitoring by the Council. It would be totally unacceptable if monitoring could not take place. CVSH have been shown to be poor managers of the existing waste recycling process; monitoring their activities would be essential.

XXXXX

366

Dear Calderdale Council

As a local resident, I object to the proposed Sowerby Bridge incinerator.

I understand that your vision for Calderdale, which I support, is “a place defined by our innate kindness and resilience, how people care for each other, ..., are full of hope.

... A great place to visit, but most importantly, a place to live a larger life.” I believe that the proposed incinerator is contrary to this vision.

I would like to see any money available for waste management in Calderdale being spent on positive improvements for the area rather than on technologies that attempt to hide problems of waste generation rather than address them - which does nothing to tackle the problem long term. For example, supporting residents and organisations to generate less waste (zero waste shops, repair cafes, etc).

I believe that with more considerate council support and investment we could live in an area where people and biodiversity thrive, rather than signing up to the 'Happy Valley' future. I don't want Sowerby Bridge sacrificing because it is not yet considered to be an attractive area. - an incinerator will only make matters worse. Please consider social and environmental justice for areas that don't have the resources to speak up for themselves.

As a XXXXX, I would also like to point out that public money already spent on plans and defence of plans does not form part of the cost/benefit of a project. There is no shame in walking away from a proposed project at a point when the business case is not proven; that is always better than pushing on regardless just because money has already been spent.

Yours, in support of clean air and a positive future for our valley

XXXXX

367 I would like to state my very strong objection to the incinerator based at Calder Valley Skip Hire. This has already been turned down by the Government Inspector and nothing has changed since. I am a resident on Rochdale Road, close to CVSH and even now there are some very strong smells emanating from the site quite often, on certain days there are a number of large lorries lined up outside the entrance waiting to get in when others come out, and the smell around those times is horrendous.

The pollution in Sowerby Bridge valley is already very poor, due to the amount of traffic flowing daily on the main roads and through the centre. There is already enough pollution coming from that site at the moment without the extra influx of more pollution from an incinerator.

It was stated that "Due to the height and proximity of the smoke stack to the trees and woodland, the inspector was unable to find that waste gases from the incinerator would be discharged in a controlled way to safeguard human health and the environment"

It is quite obvious that the gases from the incinerator would settle in the valley, just as the mist and fog does all along the valley on many occasions.

I once again would like to state my very strong objection against the new proposals to allow for the operation of the incinerator.

Kind Regards

XXXXX

368	<p>Hi ,</p> <p>I'm adding my name to the protest against the proposed incinerator being placed in Sowerby Bridge.</p> <p>This would have a huge environmental impact on the wider area and cause health problems to the area's population.</p> <p>The area is totally unsuitable for this type of project.</p> <p>This is a built up area with a dense population, a high number of children and elderly people would suffer.</p> <p>Yours faithfully</p> <p>XXXXX</p> <p>Sent from my iPhone</p>
369	<p>Please note I wish to register my objection to the Sowerby Bridge incinerator.</p> <p>XXXXX</p>
370	<p>I along with a few hundred people attended the public meet last Saturday regarding the resubmission of the application for an Environmental Permit to operate a waste incinerator at CVSH in Sowerby Bridge.</p> <p>This application seems to be a mirror of the one from August 2020, which was refused at appeal by the Government Planning Inspector in July 2023.</p> <p>I am disgusted that the council is refusing to vote on the matter and wonder why they are actually in office. What is the point of having councillors who say they disagree with the permit but won't do anything about it.</p> <p>CVSH used weather condition data from Leeds Bradford airport to support their claims about smoke dispersal. LBA is 405ft higher above sea level than Sowerby Bridge, this would need a very tall chimney to use the conditions above LBA as a comparison.</p> <p>The Inspectors findings re the smoke dispersal will not have changed since the refusal. The trees are still there and LBA is still higher than Sowerby Bridge.</p> <p>Also if the smoke did in fact rise above Sowerby Bridge it would then be blown by the prevailing wind directly to Norland.</p> <p>The condition that CMBC may request copies of site records and inspections has been removed from the new application. Even if this condition is included I don't think I would have any confidence of CMBC's ability to carry out the inspections on a regular basis during the 24 hour working periods.</p> <p>Finally it seems to me that reading reports and attending meetings, including the appeal meeting, all the problems seem to stem from the inability of the councils legal team to give correct advise since 2020.</p> <p>The council's legal team seem to be overwhelmed by the appellants team. Or as was suggested by some people at the meeting are there other underhand matters involved.</p>



I therefore wish to make a very strong complaint that this Permit is not approved.

Regards XXXXX

371	<p>I object!</p> <p>The planing permission had been thrown out, reapplied for and thrown out by the environmental office in government. I do not understand how they are able to be applying again.</p> <p>I object on the ground of not only health but environmental we live in an inverted V shape meaning that all the debris and debris and smog that is going to be released from that chimney is going to come straight down into the valley bottom affecting all the people that live here, affecting all the schools and children that growing up here.</p> <p>There is nowhere in the UK that is simile to Calderdale for its unique valleys hence no model we can compare it against for environmental or human health damage. Previous the pollution and environment factors have been compare against compare that of airport at Leeds Bradford is not acceptable. Leeds Bradford is on the top of the hill and not situated right in the middle of a residential area.</p> <p>Councils are not even going to vote on this matter it has been reported during a public meeting, one that the council did not attend to explain anything.</p> <p>I am objecting and this permit should NOT be allowed it be applied for again.</p> <p>XXXXX</p>
372	<p>I am a XXXXX resident.</p> <p>I do not wish to have an incinerator in the valley.</p> <p>I support the letter of objection by my local MP and councilors.</p> <p>Please add my name to the list of objections.</p> <p>XXXXX</p>
373	<p>Dear sirs</p> <p>Please take this email as a representation of my objection to the above proposed construction in Sowerby Bridge, how many times do the residents of Ryburn Valley need to fight this same expensive battle?</p> <p>with kind regards</p> <p>XXXXX</p>
374	<p>I would like to object to plans that cvsh are submitting again for their absurd plans for the in cinerstor . My objection is based on all the previous evidence that has been submitted and plans rejected.</p>

375 Dear Sirs

I write as a local resident to object to the continued proposals from Calder Valley Skip hire to use an incinerator on their property.

This property is below the road level by a considerable distance and any chimney would not clear the valley just pump fumes into our houses.

I have severe asthma and can't keep my windows open due to fumes and environmental impact.

Often the valley has cloud inversion so can you imagine the impact this would have on us as I'm sure you can't get a chimney high enough.

I am concerned about the impartiality of the council if this allowed considering the last appeal was rejected

XXXXX

376 To whom it may concern,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Regards  
XXXXX

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Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Regards  
XXXXX

378 I object to this application as I am of the opinion it will be totally detrimental to the health of the residents - it is a residential area- wildlife , and the environment .

The environmental report used Yeadon Airport (LBA) as reference/sample site , the airport site is completely exposed and subject to high winds at the top of a hill , whereas the bottom of the steep sided Ryburn Valley is significantly less exposed and subject to regular temperature inversions . Is it true to say that this is the ONLY planning application of an incinerator in a valley in the UK ?

On a flood plane .

379 Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience. This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result. Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets. Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop? The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review. Please, for all our sakes and all our souls, do the right thing.

The ethical thing. The responsible thing.

Yours,

XXXXX

380 Good afternoon. I wish to object to the proposed incinerator in Sowerby Bridge.

I read the "non technical summary" and I find it appalling. As a member of the public I have to go delving to understand the basics.

1, there is a global push to reduce harmful emissions into the local and wider environments. I am concerned that incinerators don't process non recyclable items safely enough.

2, the valley and Sowerby Bridge in particular is already subject to a significant amount of pollution from traffic, especially when the M62 closes.

I understand that similar applications have been declined on several occasions in the past. Whist I accept that applications can be refined I fail to see how the application can be substantially different to be locally (and globally) safe for the environmental.

Yours faithfully  
XXXXX

381 To whom it may concern,

I am writing to raise my objection to the planned waste incinerator in Sowerby Bridge. Calderdale has declared a climate emergency and this will therefore massively increase the pollution produced within the valley. I am also very concerned about the levels of air pollution in a populated area, especially when the levels are already high due to high traffic throughout the valley.

It seems grossly irresponsible to allow such an environmentally damaging facility to be built in this area, if not at all.

Many thanks,

XXXXX

382

Hello,

I would like to once again object to the proposed plans for an incinerator in sowerby bridge on the grounds of environmental impact likely to cause poor health affects for those of us living in the valley.

I reside at XXXXX and object for my household of 3.

How many ways can the residents say no before this is finally put to rest? The appeal was denied last summer. Everyone is opposed. To go against this due process followed makes it seem like this company has no regard for the law, the local government, or their neighbours.

Stop this brazen attempt at circumventing the processes followed over several years of dedicated community opposition.

Thank you,

XXXXX

383

Reg. proposal for Sowerby Bridge incinerator.

I object most strongly to this incinerator being built in this area.

Sowerby bridge already has an air pollution problem, this would add to it greatly. This will affect children I schools and nurseries nearby. People health and the environment should come before this incinerator.

XXXXX



384

To whom it may concern,  
ENVIRONMENTAL PERMIT APPLICATION, CALDER VALLEY SKIP HIRE  
LTD: REF: S13/006

I am writing again regarding the latest application for an environmental Permit for the operation of a Small Waste Incinerator Plant (SWIP) at Calder Valley Skip Hire's Belmont site. We wish to object to this latest application in the strongest possible terms.

I am extremely concerned about the environmental impact the incinerator would have at this location and call on the council to refuse the application.

In particular, I wish to note the following points:

Inability to Enforce Permit Conditions

The new application operations on the Belmont site would be governed by two separate permits, one relating to the SWOP and the broader EA permit. When CVSH applied for a permit for a site at Mearclough, Calderdale's Cabinet refused this, citing "concerns about the enforceability and any related concerns in a situation where operations on the site are governed by two separate permits; Having considered both legal advice and information from Defra, it is concluded that there is insufficient certainty about the ability of the council to enforce permit conditions...". This argument applies equally to the situation at Belmont, and therefore the Permit should be refused.

Impact on Air Quality

The site is wholly unsuited for the burning of waste, being in a steep sided, heavily wooded, densely populated valley, very close to an Air Quality Management Area (AQMA) as well as being within 2km of a dozen schools. Recreational areas, homes and businesses are all within the immediate vicinity. The air quality through the nearby Sowerby Bridge town centre is already very poor, with levels of pollutants regularly exceeding lawful limits. There is evidence to suggest that the operation of the incinerator would exacerbate the pollution problem in the valley, with an increase of NOx and small particulate matter, which would worsen the health of local residents. Indeed, in his judgement of 5th July 2023, Inspector John Woolcock concluded:

“ Taking all the above into account, I consider that the appeal should be dismissed because I am not satisfied on the evidence adduced that the proposal complies with IED Article 46 1., which requires that waste gases from waste incineration plants and waste co-incineration plants shall be discharged in a controlled way by means of a stack the height of which is calculated in such a way as to safeguard human health and the environment. Furthermore, I am unable to find that the necessary measures have been taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

The incidence of lung disease in Calderdale is notably higher than the rest of West Yorkshire, and around 4.5% of all adult mortality in Calderdale is estimated to be due to the long term exposure to harmful particulate air pollution. The borough ranks amongst some of the worst local authorities in the country for premature death rates due to respiratory disease.

The council has a duty to work to reduce air pollution, and therefore should not grant an application that may well worsen the problem. When Calderdale Council refused the Mearclough application in 2018, the reasons for refusal stated: It is accepted that there is no safe level of NOx and it is accepted that the SWIP site could impact on an AQMA. The application does not provide reasonable grounds to believe that it will not lead to an increase in NOx levels within the locality, but again there is no certainty that any action could be taken in the event of a breach.” The Belmont site is equidistant to the Sowerby Bridge AQMA, and therefore this statement applies equally to the current application as to the former.

#### Health Impacts

Dioxins are produced when burning Refuse Derived Fuel (RDF) and are described by the World Health Organisation (WHO) as “highly toxic and can cause reproductive and developmental problems, damage the immune system, interfere with hormones and can cause cancer”. Dioxins are classified as Persistent Organic Pollutants and any analysis of potential receptors

should include local businesses such as the Sowerby Bridge Day Nursery which is just down-stream from CVSH.

#### Flooding

The Calder Valley Skip Hire site at Belmont is situated adjacent to the River Ryburn, and has suffered flooding on numerous occasions. The Government's Flood Risk Checking Service shows:

The area around Calder Valley Skip Hire Ltd, Sowerby Bridge, HX6 3LL has a:

high risk of surface water flooding

medium risk of flooding from rivers and the sea

There is insufficient evidence to suggest that this flooding can be either eliminated or adequately mitigated. Any potential flooding of the site, which is possible from both surface water and river flooding, could be disastrous for the river and its ecosystems. Furthermore, we understand the flood bund, which CVSH installed on the site along the riverbank following a previous flooding incident, has a gap to allow surface water to leave the site. This would surely render it ineffective in the event of a flood incident involving raised river levels.

#### Insufficient data modelling

The applicant has used evidence from two sets of computer-modelling to support the application. One model shows the temperature distribution and residence time within the combustion chamber in order to show that a high enough temperature is reached for long enough to reduce dioxins, furans and particulates within the gas flow to acceptable levels for the emissions. A

second computer-modelling programme is used to simulate the dispersion of those emissions. In both cases these models only show results for a prescribed set of input conditions. They do not represent real world conditions which are variable and subject to abnormal or unforeseen events.

The combustion modelling is also based on typical Refuse Derived Fuel (RDF) waste composition. This requires careful sorting and segregation which relies on human intervention to obtain the correct mix of materials. The actual RDF is likely to have significant variations, thus rendering the combustion

modelling unreliable.

In addition, Inspector Woolcock noted in his report:

9. Because of an error at the planning application stage in the AOD of the proposed stack, a previous run of the model inadvertently assessed a stack height 9 m higher than the correct discharge height.<sup>40</sup> The results from this modelling do not provide any reassurance about the robustness of the stack height calculation now relied upon by the appellant because that run of the model also dealt with the trees solely by means of surface roughness length.

#### Weather Statistics

Weather data has been used for the dispersion modelling. The data used has come from Leeds Bradford Airport and Bingley. Leeds Bradford Airport is 20 miles away, and at an elevation of 208m it is England's highest airport, with a totally open aspect in all directions. The site of the proposed incinerator, in a heavily wooded, narrow valley bottom is not comparable in any way.

We would therefore argue that this renders the dispersion modelling analysis invalid.

In addition, the local topography is such that predicting dispersion in the bottom of a narrow valley is extremely complicated and normal dispersion rules do not apply. The incinerator lies in the shadow of Norland Moor which is at 280m elevation and causes a unique set of conditions. Dispersion is further complicated by the height of trees surrounded by the site.

The Ryburn Valley is known locally for its Inversions, which cause low-lying cloud to remain in the valley for hours and sometimes days. During the fire on the CVSH site in 2017, the smoke lingered for several days. This gives a clear illustration of the effects of smoke in the valley, and it is reasonable to assume that any fumes from the incinerator would behave in the same way.

#### Environmental Impact:

According to UKWIN (UK Without Incineration Network), a national crossparty group who are calling for a moratorium on all new incinerators in England (Scotland and Wales having already passed such a moratorium), every tonne of waste that is incinerated emits one tonne of carbon dioxide into the atmosphere, approximately half of which is derived from fossil fuels.

In addition, the UK already has more incinerator capacity than it needs, and in the vast majority of regions, more waste is sent to incinerators than is recycled. There is a clear comparison to be drawn between the rise of incineration rates and a decrease in recycling rates. The proposed incinerator would create a further capacity of 10,000 tonnes, which when burnt would release 10,000 tonnes of carbon dioxide into the atmosphere and would inevitably have an impact on recycling rates locally.

#### Competence of the Operator

The Council must refuse an application for an environmental permit if it considers that the applicant will not operate the regulated facility in accordance with the permit.

Unfortunately, Calder Valley Skip Hire has a poor relationship with its neighbours who allege that they have failed to abide by existing conditions resulting in hundreds of complaints. Council Officers had to intervene in 2015 after large stockpiles of waste accumulated on the Belmont site, causing a foul stench to linger throughout Sowerby Bridge. Furthermore, there was a large fire on the site in 2017, and smoke from this lingered in the valley for several days, as noted previously in our objection.

Guidance for Council Officers on the competence of an operator can include circumstances where the Council believes that the operator lacks the management systems or competence to run the installation according to the application or any permit conditions.

#### Conclusion:

We believe that the combination of insufficient data modelling, unreliable data used from inappropriate sources, and the concerns raised by Inspector Woolcock should be sufficient reasons to reject this and all subsequent applications for an environmental permit at this site.

Yours sincerely,

XXXXX

385	<p>Hi,</p> <p>I firmly believe that breathing fresh air should be a basic right of any community. The government planning inspector has already thrown out this application before with many valid reasons,</p> <p>There are lots of reasons for the refusal in the original rejection. .</p> <p>Please count this as my objection to the Sowerby Bridge Incinerator on Rochdale Road in Sowerby Bridge.</p> <p>Regards XXXXX</p>
386	<p>I am writng in objection of the incinerator application in sowerby bridge.</p> <p>I have attached photos showing what its like now when there is smoke/mist lingering in the valley. The air quality now is rubbish so what will it be like if the incinerator is allowed.</p> <p>Its a valley so why allow one when there are schools in the area and its a residential too. Wildlife would suffer too.</p> <p>So its a no from me.</p> <p>XXXXX</p>

387

Dear

I object to the granting of an environmental permit to CVSH for a small scale incinerator.

I have worked in the Chemical sector all of my life, and worked as and with Risk management consultants for many years, including 7 years at XXXXX, a company engaged in assessing risks from hazardous operations.

I have broad experience of environmental risks and modelling of dispersion. I know ADMS and have used it to assess dispersion at many locations. I would challenge the test cases that prove the validity of the data, before I accepted this in a court.

My concerns are:

Levels of pollution in Sowerby Bridge from existing sources is already causing pollution concerns, but to add to, or to increase the risk of further air pollution is absurd.

The modelling only works in areas where wind direction, air speed, elevation etc can be clearly measured. In the Ryburn Valley, where inversions are not uncommon, and tree coverage is almost immeasurable, the use of such a modelling tool is just not accurate enough, and makes too many assumptions that cannot be tested in this location.

If definitive data could be gathered, utilising synthetic exhaust gases at different times of the year under different measured conditions of wind and temperature, then it may be possible to gather some evidence to prove one way or another the harm or not that could befall the valley.

Such a programme would need significant volumes of mixed exhaust gases, that were typical of those predicted emissions at the normal exhaust temperature, at the discharge height. This is not an uncommon practice to demonstrate to a regulator that dispersion, noise or impact is not likely to be harmful. Maybe at a different scale, but with the same efflux velocity etc..

Any authorisation without definitive data would be folly, and risk the health and well being of our residents for which council members and politicians would never be forgiven.

The costs of litigation for harm to health that could be brought for decades after installation would bring ruin to our local authority for which the history books only will record.

XXXXX

XXXXX



388

As I have great concern for the health of the people of Sowerby Bridge, the surrounding area and the Calder Valley in general therefore I would like to objected to the latest application submitted on behalf of Calder Valley Skip Hire for an Environment Permit to Operate a waste incineration plant at their Belmont site.

On numerous occasions throughout the year, and in the during right conditions, the Calder Valley can be seen to fill up with fog, mist and smog which does not clear until midday or later. Any immersions, no matter how small, from such a plant can only be a bad thing and a massive backward step in trying cut backs the effects of global warming.

After Mr John Woolcock ruling to dismiss the Environment Permit to Operate that decision should be final and the second application for a permit must be withdrawn immediately.

I trust that ALL the previous concerns / objections will be taken into consideration when this latest application is considered.

Regards

XXXXX

389A Waste Incineration Plans ref: S13/006

I am disappointed to see, once again, the resubmission of the application from August 2020, which was refused by a government Planning Inspector, John Woolcock.

I now believe that Calderdale Council are refusing to vote on this and are passing the responsibility to Council Officers. Councillors were voted in by the people of Calderdale to act on their behalf. This is their role and what they are paid to do. Why are they passing this responsibility on, are they scared or being intimidated by the owners of the skip hire company? Do these officers that they have passed the responsibility on to, have the right credentials, experience and scientific understanding to make these decisions?

How can the skip hire company be allowed to resubmit their application when already turned down by a government inspector?

I believe that this incinerator, will increase pollution in the valley and reduce the air quality. The applicants agents have submitted air quality modelling data, based on pollution at Leeds Bradford Airport. The airport is on high ground compared to the Belmont Side, which is in a dip at the valley bottom, so no comparison really. Smog sits low across the valley and is often there for hours and sometimes days at a time. The stack does not even reach above the trees, so smog will sit among the tree tops and not clear. Wind might move the smog/pollution along the valley and maybe up the valley, where we have seven schools. Sowerby Bridge already suffers from pollution due to all the traffic, even worse when the motorway closes and the whole town is congested. The application has requested that the incinerator is 24 hours a day, so increasing traffic into Sowerby Bridge and around the site, this will all add to reducing the air quality in the area

The people of Sowerby Bridge have a right to clean air, family's need to know their children are not going to suffer breathing problems. We do not want everyone's else's rubbish being brought into our neighbourhood and being burned and poisoning our air

This application must be stopped now, by Calderdale Councillors, that is their role and that is what we have voted them on to do, to fight on our behalf

NO to the incinerator NOW

Yours  
XXXXX

389B This is a reply from the Met Office re: measuring weather in the valley.

This was posted on the local Sowerby Bridge chit chat sign and Councillors Must read this. It is crucial that the information supplied by Met office, confirms that they cannot meaningfully assess conditions within Ryburn valley and cannot confirm that fumes from the incinerator will be taken away and dispersed

Email from met office.

We are more and more often being asked for site specific historical data sets and ongoing forecasts which we can support with by blending together several super computer weather prediction models which incorporate real-life surface, satellite cloud and radar rainfall observations. By combining the models we are able to cancel many errors and produce more accurate forecasts and best estimates of actual considering the conditions for the site location. We are only able to go back a maximum of 5 years using this process, but this would provide data for the exact location which could be compared with the actual observations for the weather stations being used and give a truer representation of the actual site location conditions.

Reply from XXXXX Met Office re: Ryburn Valley

Apologise for the delay here but I have been speaking this through with a senior data scientist and he has said the below:

Unfortunately that is exactly the kind of application we cannot support. That is a very narrow, deep valley (~500m wide) that simply will not be resolved by our analyses or NWP (2km). We could not meaningfully assess conditions within that valley. Meteorological convention would suggest that valley would be prone to inversions/cold air pooling.

Yours XXXXX  
Sent from my iPhone

390 I already have a breathing problem and certainly do not wish this incinerator to go ahead. I have already previously voted against it - please take note of peoples c9ncerns!  
XXXXX

391 Please take this email as objection to the continued planning request by cvsh to put an incinerator on their site.

We live up from the site at XXXXX & have significant concerns over the impact on quality of air & also impact on the environment. With a young family also then who knows what the longer term damage will be done by this if they get their way.

We had hoped that finally this had gone away, but clearly it hasn't & so we will continue to object to this at a time peoples health & wellbeing is ever more in focus, as is the impact on our planet.

Regards XXXXX

392 To whom it may concern,  
I wish to submit this letter of objection to the above application on grounds of air quality and health of local residence. As per the local Councillors' objection, there is insufficient data to confirm the statements made within the application. As a resident of this area for over 20 years, I can confirm the local prevailing weather conditions are unsuitable and on occasion large amounts of smoke linked to this site sit over the town of Sowerby Bridge.

Thanks,

XXXXX

393 Dear Sirs,

I write in opposition to the Incinerator application by Calder Valley Skip Hire at Belmont.

Despite an independent Government Inspector report on how harmful to human health, and the local environment, this will be, a new application is to be reviewed by Council staff and not by councillors.

Should this be accepted will those same people be responsible for human and animal health of Calderdale inhabitants let alone the damage to the environment, it's flora, fauna and air quality. Especially in a valley that is already in an unsafe air quality area, and with the additional vehicles likely to be involved at Belmont?

Within a few kilometres of this site are many schools, homes, recreational areas, businesses all who will be affected.

Calderdale is benefitting from tourism due to filming in the area, would people really wish to visit knowing the pollution in the area is above average?

Please refer to the inspector John Woolcock advise from 5/7/2023, and make the right decision on this application.

Under no circumstances should this go ahead based on the detrimental affect it would have.

It is the councils responsibility to protect its inhabitants and its environment. Who will pick up the tab in later years to the health of both!

Please listen to the people and stop this development once and for all.

Yours

XXXXX

Sent from my iPhone

394 I object to the incinerator that is being proposed in Sowerby bridge .

395

Sent from my iPhone Dear sir / madam

Im writing to object to the Incinerator that has plans that Calderdale skip valley want to be passed in Sowerby Bridge .  
I've lived in the steep sided valley for 52 years of my life I've spent years coaching children football at XXXXX and the last thing anyone wants is children with health issues in the Ryburn valley . I have this picture in my head of children playing football with masks on and struggling to breath without clean air in the valley .  
I strongly disagree with the idea of any plans for the incinerator to go ahead .

XXXXX

396      Resubmission of Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

I strongly object to the resubmission from Calder Valley Skip Hire who have again applied for an Environmental Permit to operate on Rochdale Road. Sowerby Bridge.

This application is a resubmission of an application dated 5th August 2020 which was refused on the 5th July 2023 by a Government Planning Inspector, John Woolcock.

There was and is still compelling evidence that granting permission will be detrimental for the population of Sowerby Bridge, Triangle, residents, nursery, school junior & nursery, social & sports clubs, allotments and businesses as Sowerby Bridge is already suffering from pollution.

As for Triangle nursery, school, allotments & residents, the area is often engulfed by smoke & mist which can be seen even more clearly from higher up the valley

I & my husband are in our 70s, have lived here for almost 50 years along with our sons & at times foster children. In my younger days with friends I opened and ran a playgroup in the cellars at the local Methodist church. A few years later, with the help of a local mp the playgroup moved to a Porto cabin at Triangle School. The nursery is now combined within the extended school building.  
The Methodist church was bought, refurbished & is now a private nursery.

It is also important for us & others to live without this worry of the incinerator coming up every few years.

I'd like to believe my sons family, grandchildren, friends, neighbours & community will be able to breath cleaner air than now & even cleaner air in the future.

Regards  
XXXXX



397

Good evening

I would like to register our objection to the proposed incinerator in Sowerby Bridge.

Calderdale Council must consider the objections made to the independent Government inspector and respect the findings that the incinerator will be hazardous to the health of the residents of the Ryburn Valley. Local Councillors campaigning for their residents have worked hard to ensure that their voices are heard and threats of litigation must not deter the Council to object to what they know; that the topography of the valley already increases the likelihood of high pollution levels and the incinerator will only add to this ticking time bomb. Support your residents and reject the application.

Kind regards

XXXXX

398 I would like to formally object to the operation of an incinerator in Sowerby Bridge as a concerned local resident.

Me and my family live across the road from the CVSH site and are particularly concerned about the effects of the incinerator. Our house is in a smoke free zone, meaning that we cannot have fires on our property, it seems contradictory to allow a waste incinerator to operate only across the road from this.

CVSH are proposing to run the incinerator 24 hours a day from Monday to Friday. This will not only add to air pollution but also noise pollution in an already noisy area due to being by the main road. This part of Rochdale Road is already known for its use as an alternative route when there are issues on the M62, so adding to these already established issues of air pollution is simply reckless.

The application is a resubmission of an application dated 5th August 2020 which was refused at appeal on the 5th July 2023 by a Government Planning Inspector, John Woolcock. If initially refused, surely the reasons for this are still present.

The company did not even appeal against the Inspector's decision. They are hoping that the Council Officers will now grant them an Environmental Permit.

The Government Inspector said that given the height and proximity of the smoke stack to trees and woodland he was:

"unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment"

The job of the council is surely to 'safeguard human health' of all its constituents and their families. This should be based on pure knowledge and evidence from the trained inspectors, not the word of the company that stands to have financial and logistical gain from this.

The ADMS computer model used does not use local weather data. The flow of waste gases through the trees and valley cannot be accurately predicted by the computer simulations.

It has been shown that some incinerators can reduce recycling rates in the local areas. Along with the carbon dioxide produced by incinerating waste, this can have a significant impact on the environment; both locally and more widely spread.

Many years ago, I attended a protest against this incinerator outside the town hall. I was still in high school at the time of this protest, I am now in my second year of university. The community has been fighting against this for many years now, and I'm sure that we will not stop. I hope that CVSH are not granted a permit to run the incinerator and that they never gain a permit to operate this disposal method.

Sincerely,  
XXXXX

399

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

On a personal level, my wife and son suffer from asthma and I'm extremely concerned of the impact that this incinerator could have on their health. It's incredible that we're still having to fight for the application to be declined. Who in their right minds would want an incinerator built in a residential?? I certainly don't and more so as I live no more than 400 yards from the proposed site. Not to mention the negative impact that the incinerator could have on the value of my property?!?!?

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,

XXXXX

400A Dear Sir/Madam,

I am writing to express my sincere disapproval about the application by Calder Valley Skip Hire for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

It seems bizarre that, so soon after its previous application was overturned, the company should shamelessly make another bid to pollute the area with its noxious smoke and gases.

As an enthusiastic walker throughout Calderdale, I would vote with my feet and avoid the neighbourhood if CVSH's application proved successful. Many more in my position would do the same.

Please see sense, thwart commercial greed and make clean air in Calderdale a priority.

Yours sincerely,

XXXXX

400B Dear Sir/Madam,

I am writing to express my sincere disapproval about the application by Calder Valley Skip Hire for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

It seems bizarre that, so soon after its previous application was overturned, the company should shamelessly make another bid to pollute the area with its noxious smoke and gases.

As an enthusiastic walker throughout Calderdale, I would vote with my feet and avoid the neighbourhood if CVSH's application proved successful. Many more in my position would do the same.

Please see sense, thwart commercial greed and make clean air in Calderdale a priority.

Yours sincerely,

XXXXX

401

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,

XXXXX

402 Dear Sir or Madam

We wish to express our objections to the Sowerby Bridge Incinerator because

It is very unhealthy for the environment in an area that has a lot of residential housing

There are schools and it is a health hazard for the children

The waste gases could not be discharged in a controlled way as to safeguard health

The local Councillors and local MPs have opposed this application

Breathing clean air should be a right of any community.

Signed by XXXXX

403 Hello

I am writing to submit my objection to the application by Calder Valley Skip Hire for an Environmental Permit for their Belmont Site.

This is a reapplication for a permit that has already been refused and I feel should be refused again.

It has been proven that this incinerators location in the bottom of the valley means that the dispersion of harmful particles can't be guaranteed thus meaning that this application can still pose a threat to public health.

Kind regards

XXXXX



404

Dear Sirs

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Thank you.

XXXXX

405

Hello

Please see below my objection both as a Ryburn ward councillor and a mother of two children that live in the Ryburn ward to the permit application for an incinerator.

I was sat at the table during the hearing where the previous application to this was denied on the grounds that it could not be proven that waste gases discharged would not have an adverse effect on human health. If this could have been proven the applicant should have taken the refusal from the inspector to an appeal rather than lay the application again at the councils feet. One could wonder why they have chosen to do it this way.

However they have chosen to apply again with modelling using data from Leeds Bradford airport. Last time I checked the airport was not located at the bottom of a high sided valley covered in woodland, therefore immediately raising concerns about the legitimacy of this model.

Whilst we would all like to trust in “robust” modelling from computer software we have seen where that has led us in the past , Horizon software with the post office or Neil Ferguson’s modelling of 500000 deaths due to Covid if we didn’t lock down. A computer model now widely accepted as flawed. These are only two examples of well publicised issues with computer software and modelling.

This application has already been refused on the grounds of safety and there is no reason the think any differently with this application.

Kind regards  
XXXXX

406

Application for environmental permit for Schedule 13 small waste incinerator plant ref: S13/006

To whom it may concern,

I would like to register my objections to the request to install a small waste incinerator at Calder Valley Skip hire, Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.

I am concerned about the impact it will have on mine and my families health. We already have problems with the air pollution from the existing site which is positioned in the very bottom of the valley surrounded and enclosed by large trees.

A previous fire at the site caused us to feel ill due to the smell and we had to close all the windows in our home. The smoke and smell lasted for days, spreading from one end of the valley to the other. It lingered in the valley and then spread upwards affecting the surrounding areas as it was the only way it could disperse.

If this incinerator is to operate 24 hours a day and burn 10,000 tons of waste a year we could potentially find the same thing happening again, leading to further air pollution which would affect everyone living in the surrounding areas.

The previous application was refused following a Government inspection, finding. The waste gases would not be able to be discharged without being able to safeguard human health and the environment. So what has changed as the site is in the same place and the trees are still there? The weather impacts on the area too, as we get mist which regularly lies in the valley prohibiting the waste gases to disperse.

As I understand it this application has removed the right for the local councils ability to monitor compliance if the incinerator were to be operated. Leaving the owners to do what they want without any repercussions. This is unacceptable.

Sowerby Bridge has enough issues with traffic pollution. If the incinerator is allowed it will no doubt create further air pollution issues. The council are readying to improve Wharf Street and pumping public money in to do it, it will be a pointless exercise and waste of money if the incinerator goes ahead, creating further unnecessary air pollution.

There are schools, homes, cricket and rugby fields within a short distance of the site, to name but a few. The impact on residents, children, those attending public events, walkers and canal users could create further health issues impacting on our already overloaded Doctors and hospitals. It could also stop tourists from coming to the area if they were made aware of the poor air pollution.

I strongly object to this request and hope planning permission is refused.

Regards

XXXXX

407

To Whom it may concern,

I would like to object to the application for this incinerator

Air quality in the Vally needs to be protected,

We should be focusing on Carbon reduction , how do we do this in a narrow valley by placing an incinerator in this area.

The access to the site is dreadful as the road is continually blocked with wagons waiting to access the site causing tale back of traffic in both direction.

The road surface is already in bad repair. This will just get worse with the large wagons.  
Please reject any application

From  
XXXXX

408A To whom it may concern

I, XXXXX, I would like to issue my objections to then latest Calder Valley Skip Hire Permit Application for a Small Waste Incinerator Plant (SWIP) in Sowerby Bridge ref. S13/006 for a number of reasons of which will be detailed below.

As a local resident and parent of a young child, I object to the incinerator on a multitude of levels. The air quality cannot be guaranteed, and this is an extreme concern for me. With a child that already suffers from breathing issues one of the reasons we moved to the area was for the cleaner air and nicer environment there is no way this will be kept if we have an incinerator next to us. Due to the location of the proposal and our house we often can smell, breathe and taste the burning which is already done in the base of the valley from the company, and this will only get worse should this continue so you are affecting the health of local residents especially children and in this day and age this is simply unacceptable.

Our local area, it is heavily residential, lots of local school both nurseries, primary and secondary and independent businesses which bring people to the local area. How do you think this incinerator will affect this ? It definitely will not affect them in a positive way, and this will have a huge impact on house prices, health and tourism. Due to the geographical nature of the valley, fog, smoke etc. is often held in the base of a valley and takes a long time to dissipate due to steep valley sides so again this will be even worse if an incinerator was added to this valley and again is not acceptable in any way, shape, or form.

The application has already been put forward from CVSH and refused so I struggle to see why this is allowed to be put forward again with simply some rewording, this is taking up valuable time and resources of local residents, council members etc. and cannot be allowed to continue. Local resident, politicians, business owners etc. have made their feelings very clear on this matter through the huge amounts of objections raised, local meetings to share information and objections, petitions, and protests as recent as yesterday. No means No, please stop these corporations buying their way into what they want and ignoring residents and constituents – for once we need to matter. SO many times, the people are ignored to catastrophic consequences. DO you want the health of these residents on your conscience.

We as a nation and globally are trying to reduce our carbon footprint and environmental impact on the world and having an incinerator in the bottom of a valley which is renowned to hold gases etc. is impacting this footprint and not aiding it. It is just not acceptable, and we need to make a stand against this.

The local traffic through Sowerby bridge is horrific, again this will get worse with the incinerator, risk of lives with trucks hurtling down the road which is already dangerous, congestion through the town centre, rat running through the back streets, road conditions in terms of pot holes etc. are already horrendous and then will be worsened. This will cost the council to fix – CVSH will not be held responsible.

All you can see here are issues – there are no positives to this so why on earth would this be allowed to go ahead. As a compromise CVSH should try and find a better location, one that is more suited to the incinerator, I respect the fact they

may need one but not in this location.

Detailed objections;

1. An original SWIP Permit application (APP/EPR/603) was turned down in 2018 on the basis of insufficient evidence to guarantee air quality for residents and surrounding businesses, in that it could not be guaranteed that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.
2. A virtually identical Permit application of August 5th 2020 SWIP was refused at appeal on the 5th July 2023 by Government Planning Inspector John Woolcock. The Government Planning Inspector refused a permit stating he was “unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”
3. The virtually identical Permit application of August 5th 2020 SWIP (refused at appeal) totally relied 100% on an ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools. The effect of the specific weather condition of inversion in a valley bottom as compared to the weather data used for from a hill top, has not been taken into account on the ADMS computer model data when it would be crucial to the report figures on the flow and dispersion of waste gases relating to any application for a small waste incinerator environmental permit in the valley bottom of Sowerby Bridge.
4. The current new application ref. S13/006 of Feb 20th 2024 relies totally 100% on the same ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools.
5. The current new application ref. S13/006 of Feb 20th 2024 has the same height and size of waste gas exhaust discharge stack and appears to be a resubmission of the application dated Aug 5th 2020 but with added information stated as an ‘independent review’ by RPS on behalf of CVSH. The independent review was done by CERC (Cambridge Environmental Research Consultants) to verify the treatment of trees within the air quality assessment by RPS.

The review should be not be taken into consideration and the permit application should be refused as it does not contain an “independent” review. CERC are the producers of the ADMS air modelling software that RPS used for this application. CERC have a vested interest in not showing up problems with their software or upsetting their customers (CVSH). The CERC report should be disregarded as unreliable in that it stated that ‘the approach adopted within the air dispersion modelling is considered appropriate and there are no other suitable models/software available’; when this is not the case and other suitable models/software are available.

6. Inversion being deviation from the normal change of an atmospheric property in comparing the flow and dispersion of waste gases from a low valley bottom in close proximity trees and buildings, with the high altitude of an open hill top site as per weather data used for the permit application submitted. As the application for the Permit relies 100% on the computer model, the permit application should once again be refused as being incorrectly assumptive and as such inaccurate in not taking into account the site being located in a valley with a history of detrimental inversion.

As such the ADMS computer model data as submitted is unsafe in its attempt to guarantee safeguarding of human health and the environment.

7. The proposed Incinerator site and waste exhaust fume plume smoke stack is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2) and is identified as subject to a Council and local Environmental Health initiative to improve the air quality.

The permit should be refused given the historic evidence of smoke and low cloud hanging in the valley bottom due to the unique terrain which is the exact opposite of the computer model figures from Yeadon Airport, the waste exhaust fumes from the proposed smoke stack would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

8. As the proposed Incinerator site is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2), the additional travel to and from the site through Sowerby Bridge of extra diesel fuelled waggons transporting 2 tonnes per hour (Monday to Friday for 52 weeks per year) and then re-transporting away the non-combustible waste to landfill; would in the first instance further add to the already damaging traffic congestion and in the second instance damage even further the air quality of Management Area, (AQMA2)

The permit should be refused as the extra traffic throughput, poisonous exhaust fumes and congestion would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

9. With regard to monitoring; the August 2020 CVSH permit application states "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time." The January 2024 application by CVSH should be refused as CVSH have removed the statement "CMBC may

request copies of the site diary and site inspection records relating to SWIP operations at any time." The Permit should also be refused as there would be a restriction if not an impossibility for CMBC to continuously monitor emissions to air in order to confirm that levels are within IED emission limits, given the removal of the power of CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time.

As such the permit application does not fulfil its obligation in guaranteeing that necessary measures will be taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

10. The new application report dated 26 Jan 2024 submitted by RPS on behalf of CVSH states that the refusal at appeal decision by Government Inspector John Wilcock is “perverse” and “procedurally unfair” but yet did not take up their option to take it to Judicial Review.

The permit application should be refused as it appears both perverse and procedurally unfair of CVSH in submitting what they state is basically the same application as in 1.5.5 in the new application report. The permit application should furthermore be refused as it appears to be abuse of process by CVSH in not taking their option to take the original appeal decision to Judicial Review, but alternatively submitting what CVSH state is basically the same application on 20<sup>th</sup> Feb 2024 as was refused some 7months later on 5<sup>th</sup> July 2023 by Government Inspector John Woolcock.

Regards

XXXXX



408B To whom it may concern

I, XXXXX, I would like to issue my objections to then latest Calder Valley Skip Hire Permit Application for a Small Waste Incinerator Plant (SWIP) in Sowerby Bridge ref. S13/006 for a number of reasons of which will be detailed below.

As a local resident and parent of a young child, I object to the incinerator on a multitude of levels. The air quality cannot be guaranteed, and this is an extreme concern for me. With a child that already suffers from breathing issues one of the reasons we moved to the area was for the cleaner air and nicer environment there is no way this will be kept if we have an incinerator next to us. Due to the location of the proposal and our house we often can smell, breathe and taste the burning which is already done in the base of the valley from the company, and this will only get worse should this continue so you are affecting the health of local residents especially children and in this day and age this is simply unacceptable.

Our local area, it is heavily residential, lots of local school both nurseries, primary and secondary and independent businesses which bring people to the local area. How do you think this incinerator will affect this ? It definitely will not affect them in a positive way, and this will have a huge impact on house prices, health and tourism. Due to the geographical nature of the valley, fog, smoke etc. is often held in the base of a valley and takes a long time to dissipate due to steep valley sides so again this will be even worse if an incinerator was added to this valley and again is not acceptable in any way, shape, or form.

The application has already been put forward from CVSH and refused so I struggle to see why this is allowed to be put forward again with simply some rewording, this is taking up valuable time and resources of local residents, council members etc. and cannot be allowed to continue. Local resident, politicians, business owners etc. have made their feelings very clear on this matter through the huge amounts of objections raised, local meetings to share information and objections, petitions, and protests as recent as yesterday. No means No, please stop these corporations buying their way into what they want and ignoring residents and constituents – for once we need to matter. SO many times, the people are ignored to catastrophic consequences. DO you want the health of these residents on your conscience.

We as a nation and globally are trying to reduce our carbon footprint and environmental impact on the world and having an incinerator in the bottom of a valley which is renowned to hold gases etc. is impacting this footprint and not aiding it. It is just not acceptable, and we need to make a stand against this.

The local traffic through Sowerby bridge is horrific, again this will get worse with the incinerator, risk of lives with trucks hurtling down the road which is already dangerous, congestion through the town centre, rat running through the back streets, road conditions in terms of pot holes etc. are already horrendous and then will be worsened. This will cost the council to fix – CVSH will not be held responsible.

All you can see here are issues – there are no positives to this so why on earth would this be allowed to go ahead. As a compromise CVSH should try and find a better location, one that is more suited to the incinerator, I respect the fact they

may need one but not in this location.

Detailed objections;

1. An original SWIP Permit application (APP/EPR/603) was turned down in 2018 on the basis of insufficient evidence to guarantee air quality for residents and surrounding businesses, in that it could not be guaranteed that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.
  2. A virtually identical Permit application of August 5th 2020 SWIP was refused at appeal on the 5th July 2023 by Government Planning Inspector John Woolcock. The Government Planning Inspector refused a permit stating he was “unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”
  3. The virtually identical Permit application of August 5th 2020 SWIP (refused at appeal) totally relied 100% on an ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools. The effect of the specific weather condition of inversion in a valley bottom as compared to the weather data used for from a hill top, has not been taken into account on the ADMS computer model data when it would be crucial to the report figures on the flow and dispersion of waste gases relating to any application for a small waste incinerator environmental permit in the valley bottom of Sowerby Bridge.
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- The review should be not be taken into consideration and the permit application should be refused as it does not contain an “independent” review. CERC are the producers of the ADMS air modelling software that RPS used for this application. CERC have a vested interest in not showing up problems with their software or upsetting their customers (CVSH). The CERC report should be disregarded as unreliable in that it stated that ‘the approach adopted within the air dispersion modelling is considered appropriate and there are no other suitable models/software available’; when this is not the case and other suitable models/software are available.

6. Inversion being deviation from the normal change of an atmospheric property in comparing the flow and dispersion of waste gases from a low valley bottom in close proximity trees and buildings, with the high altitude of an open hill top site as per weather data used for the permit application submitted. As the application for the Permit relies 100% on the computer model, the permit application should once again be refused as being incorrectly assumptive and as such inaccurate in not taking into account the site being located in a valley with a history of detrimental inversion.

As such the ADMS computer model data as submitted is unsafe in its attempt to guarantee safeguarding of human health and the environment.

7. The proposed Incinerator site and waste exhaust fume plume smoke stack is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2) and is identified as subject to a Council and local Environmental Health initiative to improve the air quality.

The permit should be refused given the historic evidence of smoke and low cloud hanging in the valley bottom due to the unique terrain which is the exact opposite of the computer model figures from Yeadon Airport, the waste exhaust fumes from the proposed smoke stack would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

8. As the proposed Incinerator site is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2), the additional travel to and from the site through Sowerby Bridge of extra diesel fuelled waggons transporting 2 tonnes per hour (Monday to Friday for 52 weeks per year) and then re-transporting away the non-combustible waste to landfill; would in the first instance further add to the already damaging traffic congestion and in the second instance damage even further the air quality of Management Area, (AQMA2)

The permit should be refused as the extra traffic throughput, poisonous exhaust fumes and congestion would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

9. With regard to monitoring; the August 2020 CVSH permit application states "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time." The January 2024 application by CVSH should be refused as CVSH have removed the statement "CMBC may

request copies of the site diary and site inspection records relating to SWIP operations at any time." The Permit should also be refused as there would be a restriction if not an impossibility for CMBC to continuously monitor emissions to air in order to confirm that levels are within IED emission limits, given the removal of the power of CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time.

As such the permit application does not fulfil its obligation in guaranteeing that necessary measures will be taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

10. The new application report dated 26 Jan 2024 submitted by RPS on behalf of CVSH states that the refusal at appeal decision by Government Inspector John Woolcock is “perverse” and “procedurally unfair” but yet did not take up their option to take it to Judicial Review.

The permit application should be refused as it appears both perverse and procedurally unfair of CVSH in submitting what they state is basically the same application as in 1.5.5 in the new application report. The permit application should furthermore be refused as it appears to be abuse of process by CVSH in not taking their option to take the original appeal decision to Judicial Review, but alternatively submitting what CVSH state is basically the same application on 20<sup>th</sup> Feb 2024 as was refused some 7months later on 5<sup>th</sup> July 2023 by Government Inspector John Woolcock.

Regards

XXXXX

409 Dear sirs

I wish to object to the proposed operating license for this incinerator on the following grounds

1. In July 2023 a government planning inspector refused the application due to concerns about the discharge of waste gasses and their risks to the health of local people and the environment. Nothing in the new proposal changes or reduces these risks.

2. Polluting gasses will not disperse above the level of housing and Schools in the valley. There are 9 schools within a mile, and 18 within 2 miles of the chimney. The schools in closest proximity are all above the height of the chimney. A public footpath runs adjacent to the facility. The polluting gasses will not disperse sufficiently to make it safe.

3. In the last week the valley has experienced temperature inversions on 3 occasions - where smog and cloud form in the valley bottom and take half a day to clear, trapping poisonous gasses from traffic and other polluters in the valley bottom - to be inhaled by people in the valley . With climate change this will increase.

4. Calderdale has the highest rate of respiratory tract infections in West Yorkshire for infants under one in 2016 and asthma admissions in 2019

5. The proposal uses data from a weather station at Leeds Bradford airport to show gasses will be dispersed. This is 20 miles away from the site, and has a totally different topography. The Ryburn Valley and prevailing winds mean that emissions will blow towards center's of local population.

6. There are reasonable doubts as to whether CVSH would operate an incinerator correctly. Already there have been several fires and there is a flood risk in the valley. CVSH have shown the wrong post code on the application, for a place not at risk of flooding.

7. Why would the application remove the councils ability to request site diaries and inspection records to monitor compliance ?

Please refuse this application. The risks to air quality and health are too high.

XXXXX

410 Please accept this objection to the incinerator application from Calder valley skip hire in Sowerby Bridge. As a local resident who has lived in XXXXX all my life I am growing increasingly concerned with the level of pollution in the town which will only be made worse if this is granted. Please consider the quality of life for the residents of XXXXX and don't let this spoil our beautiful town even more. We need to be coming up with solutions to tackle the pollution we have already!

King regards  
XXXXX

411 Dear councillors and officers,  
Please reject this cynical re-submission of an application to impose a dirty incinerator at Sowerby Bridge. The appeal has already said no. This waste of public funds and community time needs to be stopped. The valley does not need more pollution-industries!  
I trust that you will stop this deceitful application, before further action is required by the local people.  
Sincerely,  
XXXXX

Sirs,

I wish to object to the above application for a permit to operate an incinerator at Cvsh Belmont site in Sowerby Bridge for the following reasons:

1. There is no safe limits to micro particulates and dioxins produced by incineration. The devolved governments of the UK other than England have banned all further incineration applications on this basis. The permit would allow 10,000 tonnes to be incinerated per year by the plant operating 24 hours per day, 6 days per week-the effect on local air pollution will be significant.
2. There are 7 schools in the immediate vicinity of the Belmont site. These range from infant to 6th form. Any incinerator use would effect 2600 children who will be exposed to severe air pollution for the entire school year. This will put their health at serious risk.
3. The CVSH Belmont site is situated in a narrow steep sided valley which is subject to regular inversion of temperature events when air and air pollution is trapped in the valley making air pollution likely to increase significantly during these events- the last on was approximately 3 weeks ago.
4. Traffic issues - the large amount of waste to be incinerated will result in a significant increase in HGV traffic to the Belmont site over and above the current high rate of traffic to the site increasing both vehicle pollution and road safety. Queuing HGVs on the main road is already causing traffic congestion which can only increase. The existing traffic turning into the Belmont site is damaging the road surface outside the entrance and this will only get worse, endangering all road users.
5. Lack of Democratic decision making. The decision to grant the application will not be made by Calderdale elected councillors but by unelected council officers. Is this legal? Certainly this would make a mockery of local democracy if the application is approved.
6. Oversight of CVSH if incineration is permitted. I understand that there will be minimal or no oversight as to what materials would be incinerated. Potentially CVSH could burn whatever they wished so that air pollution would be much worse than CVSH has proposed in their permit application.
7. Last year effectively the same application for a permit to operate was refused by a government inspector. CVSH did not appeal. So why a new application. No salient facts have changed.

I hope and expect for all the above reasons that the application be refused once and for all and that CVSH be made to remove all the incineration equipment immediately. I suspect that this equipment is currently in use without a permit.

Kind regards,  
XXXXX



413 I am writing to express my objection in the strongest possible terms, once again, to the proposed incineration plant in Sowerby Bridge.

Nothing has changed since previous objections.

The impact this has on the community, environment and economy is a frightful prospect.

As a keen cyclist and outdoorsman living in HX6, breathing the cleanest possible air is important mentally and physically, for myself and my family and everyone else in the vicinity of this monstrosity.

To have this site opened in the area will only degrade the quality of life of those living here as well the financial implications to future house sale value.

There are better ways to spend money in the area such as controlling traffic and repairing the shocking road surfaces in the district.

As a resident in close proximity to the proposed incineration plant site, I strongly oppose its construction due to the potential detrimental effects on our health and environment.

Incineration plants release harmful pollutants such as dioxins, heavy metals, and particulate matter into the air, posing significant risks to respiratory health and overall well-being.

Additionally, the increased traffic and noise associated with the plant's operation would disrupt the tranquility of our community and decrease property values. We must prioritise sustainable and less harmful waste management solutions that do not compromise the health and safety of residents.

It's baffling that some councilmen are even considering the construction of an incineration plant near our homes, seemingly oblivious to the health risks and environmental consequences it would entail. Perhaps they should spend a day in our shoes, breathing in the polluted air and witnessing the disruption to our peaceful community, before making such decisions that impact our lives so profoundly.

Please revisit the initial inspection decision and respect the remarks that were made originally, instead of pushing an

agenda that does not affect you because it's just another piece of paper on your desk.

Sincerely,

XXXXX

414	<p>Good Morning I would like to submit our objection against the Incinerator planned for Sowerby Bridge, it is unsafe for the health of residents,i don't know how they can even think about granting the application when the pollution rate is already a concern for our health in that area, it's absolutely disgraceful and we strongly object.</p> <p>Kind regards XXXXX</p>
415	<p>Please accept this email as my strong opposition against the incinerator reapplication.</p> <p>With best wishes,  XXXXX</p>
416	<p>Hi,</p> <p>I live in XXXXX and would like to lodge an official objection to any incinerator plans in the Ryburn Valley, but also specifically the plans of Calder Valley Skip Hire.</p> <p>Appart from the obvious problem of high levels of pollution sitting in the Valley from the incinerator, there is the additional concern of large numbers of HGVs sitting idling on the main road and down the drive, both kicking out exhaust fumes, but also blocking the road and churning up the tarmac. The road at the top of their drive is horrific.</p> <p>It's not unusual to see 3 or 4 lorries waiting on the drive with the same again waiting up on the main road. The road itself is busy enough without the additional blockages. It's also a main diversion route when the M62 is closed which adds to the problem. Its only going to get worse if they are importing even more refuse.</p> <p>On a more personal level I have a XXXXX. He is XXXXX as a result. He has already spent XXXXX in hospital because of breathing difficulties and was recently prescribed and inhaler to help him. It's just not fair to him and hundreds of people like him who live in the Ryburn Valley.</p> <p>Regards  XXXXX</p>

417      Schedule 13 SWIP Permit Application S13/006  
Calder Valley Skip Hire Ltd

Good morning

I strongly object to the application for the grant of this environmental permit for the following reasons.

I live less than XXXXX meters from the proposed site up XXXXX. We can see the site XXXXX. Any emissions from the stack that gather in the valley under certain weather conditions will be XXXXX and any emissions radiating further into the air will reach our house and other local properties, which will obviously compromise our air quality.

Any noise emitting from the operation will carry up the hill to the residents of Norland. Noise pollution is something I take seriously, and XXXXX. The plans to run the site 24 hours a day Monday to Friday will definitely impact my XXXXX.

I find it very difficult to accept and understand that this type of development can be permitted in the bottom of a steep sided valley where pollutants cannot escape into the atmosphere. The burning of waste at the bottom of a valley like this is ludicrous as it will create toxic biproducts which will adversely effect the health of the local residents.

Breathing clean air is a basic human right.

Regards  
XXXXX

418      Dear Sir/Madam

I am writing to object in the strongest possible terms to the plans for the proposed incinerator in Sowerby Bridge. If permission were granted there would be a huge threat to both residents' health and the environment from the waste gases that the government inspector refusing the appeal did not think 'could be discharged in a controlled way as to safeguard human health and the environment.'

Yours faithfully

XXXXX

419 Dear Sirs,

This is to confirm my strong Objection to the proposed SWIP at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge HX6 3LL.

I am in full agreement, and support, the Local Residents' Objections to the Environmental Permit for the reasons that the proposed Plant does not satisfy the requirements of the Statutory Standards, and that the Permit Application does not comply with the applicable regulations and guidance.

I am a XXXXX, which includes XXXXX.

I attended the Inspector's Hearing at the Piece Hall in Halifax, and also made a Submission to the Inspector.

Amongst the great concerns I have about this proposal include the following:

The equipment will not fit inside the building, and this will increase the risk of an explosion/fire.

There is a risk of flooding on the site.

There is a risk of emissions polluting local schools and residencies.

Calculations regarding Energy Efficiency are incorrect.

There is no evidence of proper designs nor detail of operational procedures and safety measures.

There are no meaningful definitions of the fuel to be burned, and no plans/rules for acceptance criteria.

There has been no scientific analysis provided of the dangers of various possible emissions and noxious gases arising from the operation of the Plant.

There are no guidelines for commissioning of the Plant, nor of its operational procedures.

There are inconsistencies in the various reports about basic design of the Plant, some saying it is loaded from the side and some from above - this is fundamental to the safety of the workspace and operational procedures.

Furthermore, the Environmental Permit should not be granted because the Government-appointed Inspector concluded at the last Appeal in 2023 that the proposed Incinerator would be a risk to 'human health'.

Please deny the Permit for all these reasons stated.

Yours faithfully,

XXXXX

420	I object to this facility being allowed. Air quality in the town isn't good and would only get worse
421	<p>Dear sirs,</p> <p>I object to the application due to the local environmental pollution it will cause.</p> <p>Kind regards</p> <p>XXXXX</p>
422	<p>Dear Calderdale Council,</p> <p>I wish to once again object to the planned incinerator being allowed to operate in the valley bottom in Sowerby Bridge. It has clearly been found by experts that this an unsuitable location and will have a huge impact, due to density and the close proximity of local residents.</p> <p>As a local resident of more than 60 years, I would like to think that the future of Sowerby Bridge and the lower valley area will not be shrouded in pollutants and residue from the burning of waste from an incinerator.</p> <p>I ask you to please take notice and heed the results and recommendations made by experts and do not allow this to proceed.</p> <p>Surely there are much more appropriate locations on much higher ground where this could be located!</p> <p>Sincerely,</p> <p>XXXXX</p>

423

Hi,

I would like to object to the proposed development of a waste incinerator at the Calder Valley Skip site in Sowerby Bridge. The valley at this particular point is quite narrow and high sided and there is a real danger that any fumes coming from the incinerator would linger in the valley. I have lived in various points along Rochdale road & have witnessed how low cloud can become stuck in this valley and as soon as you climb up to Bolton brow you're finally greeted with clear skies. Another point to highlight how smoke/cloud/fumes etc linger in this valley would be to observe during busy periods following bonfires (bonfire nights/burning of garden waste etc) the smoke & smell can linger down here for days, on occasion more - how can you the citizens be expected to live under those conditions permanently?

We already have a problem with the volume of traffic, which isn't helped on the numerous occasions when the motorway shuts, surely the suffering from traffic fumes is enough for us to cope with.

There are a number of primary schools and high schools which all would be affected not to mention the huge number of homes. This area is highly populated, surrounded by hills, any pollutants linger due to the geographical setting - adding to the pollutants would be detrimental to everybody & the environment. We are living in an age where the awareness of the delicate nature of the environment has been pushed to the forefront. we should be doing everything in our power to protect the environment, for future generations, not trying to destroy it. Already there has been proven cases where fumes from vehicles have been detrimental to health and now we're seriously considering adding to the pollutants in this valley?!

XXXX

424

Dear Sir/Madam

I would like to object to the building of an incinerator and the usage of the incinerator in Sowerby bridge for the below reasons

1. Noise (we can hear the skip operation from our house even though I was told we would NOT be bale to when we objected)
2. extra traffic to and from the site adding to pollution and the extra wagons ripping up an already distressed part of the road at the site entrance
3. pollution from the incinerator, in the case of a catastrophe failure or any failure on the site the pollution would stay in the valley for days like it has done before when there has being fires at the site

Yours

XXXXX

425

To whom it may concern

I, XXXXX of XXXXX object to the latest Calder Valley Skip Hire Permit Application for a Small Waste Incinerator Plant (SWIP) in Sowerby Bridge ref. S13/006.

The general grounds for objection are those of detriment to air quality from both the plant itself and the associated supply/ delivery/ removal additional traffic generations, plus the lack of any convincing atmospheric and weather pattern/ computer model that is specific to this sheltered valley bottom location.

Indeed, the model used to justify yet another application was for an open hilltop site near Leeds with no surrounding buildings schools or trees. The complete opposite of the characteristics for the Application site in a sheltered valley near Sowerby Bridge.

The current Application seems to be, broadly speaking, a 're-run' of the failed 2018 & 2020 previous applications (the 2020 one also subsequently turned down at Appeal by HMG Inspectorate), with the added worries (for people like me living only 1 – 1 ½ miles due East of the site that has a dominant weather/ wind/rain direction for most of the year from the West!!) that there would be a restriction if not an impossibility for CMBC to continuously monitor emissions to air in order to confirm that levels are within IED emission limits. The Council simply don't have that kind of budget, money or power.

As such there would be no mitigation or accountability by the Applicant to eliminate pollution risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

XXXXX



426

Dear Sir or Madam,

I object in the strongest terms to the application by Calder Valley Skip Hire for an incinerator in Sowerby Bridge.

The proposal will significantly affect the health and wellbeing of those living in the surrounding area, predominantly through effects on air quality. It is completely at odds with the air quality management area in place, which acknowledges there is a significant problem already with this issue. It is obvious to anyone who knows the area that the topography and micro climate will result in fumes not dispersing, and I understand that the modelling in the application does not take into account such local factors.

I believe it is likely to significantly affect house prices in the area, as I expect people may well want to move away if this is allowed. I moved here two years ago - I certainly wouldn't have done if I had any expectation this hazardous application was going to be revisited.

Such an application is also completely at odds with net zero targets at both local and national scales. I am appalled that such an application is even allowed, and strongly hope that the views of residents are taken into account. I have not come across a single person who would endorse the scheme, and I can see no benefits to the local area or people - only significant harms.

Best wishes,

XXXXX

427

For your information I am totally against the proposed incinerator at Calder Valley Skip Hire company adjacent to Rochdale Rd.

This would be sited in the valley bottom and would frequently give rise to low level pollution made worse in winter by inversion layers that frequently occur there.

REFUSE PLANNING APPLICATION PLEASE.

XXXXX

428 I would like to object to the application by Calder Valley Skip Hire for an environmental permit to operate a waste incinerator in Sowerby Bridge.

I believe that breathing clean, unpolluted air is a basic human health right which would be put in jeopardy by the incinerator.

Thank you

429

To whom it may concern,  
ENVIRONMENTAL PERMIT APPLICATION, CALDER VALLEY SKIP HIRE  
LTD: REF: S13/006

We are writing again regarding the latest application for an environmental Permit for the operation of a Small Waste Incinerator Plant (SWIP) at Calder Valley Skip Hire's Belmont site. We wish to object to this latest application in the strongest possible terms.

We are extremely concerned about the environmental impact the incinerator would have at this location and call on the council to refuse the application. In particular, we wish to note the following points:

#### Inability to Enforce Permit Conditions

The new application operations on the Belmont site would be governed by two separate permits, one relating to the SWOP and the broader EA permit. When CVSH applied for a permit for a site at Mearclough, Calderdale's Cabinet refused this, citing "concerns about the enforceability and any related concerns in a situation where operations on the site are governed by two separate permits; Having considered both legal advice and information from Defra, it is concluded that there is insufficient certainty about the ability of the council to enforce permit conditions...". This argument applies equally to the situation at Belmont, and therefore the Permit should be refused.

#### Impact on Air Quality

The site is wholly unsuited for the burning of waste, being in a steep sided, heavily wooded, densely populated valley, very close to an Air Quality Management Area (AQMA) as well as being within 2km of a dozen schools. Recreational areas, homes and businesses are all within the immediate vicinity. The air quality through the nearby Sowerby Bridge town centre is already very poor, with levels of pollutants regularly exceeding lawful limits. There is evidence to suggest that the operation of the incinerator would exacerbate the pollution problem in the valley, with an increase of NOx and small particulate matter, which would worsen the health of local residents. Indeed, in his judgement of 5th July 2023, Inspector John Woolcock concluded:

“ Taking all the above into account, I consider that the appeal should be dismissed because I am not satisfied on the evidence adduced that the proposal complies with IED Article 46 1., which requires that waste gases from waste incineration plants and waste co-incineration plants shall be discharged in a controlled way by means of a stack the height of which is calculated in such a way as to safeguard human health and the environment. Furthermore, I am unable to find that the necessary measures have been taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

The incidence of lung disease in Calderdale is notably higher than the rest of West Yorkshire, and around 4.5% of all adult mortality in Calderdale is estimated to be due to the long term exposure to harmful particulate air pollution. The borough ranks amongst some of the worst local authorities in the country for premature death rates due to respiratory disease.

The council has a duty to work to reduce air pollution, and therefore should not grant an application that may well worsen the problem. When Calderdale Council refused the Mearclough application in 2018, the reasons for refusal stated: It is accepted that there is no safe level of NOx and it is accepted that the SWIP site could impact on an AQMA. The application does not provide reasonable grounds to believe that it will not lead to an increase in NOx levels within the locality, but again there is no certainty that any action could be taken in the event of a breach.” The Belmont site is equidistant to the Sowerby Bridge AQMA, and therefore this statement applies equally to the current application as to the former.

#### Health Impacts

Dioxins are produced when burning Refuse Derived Fuel (RDF) and are described by the World Health Organisation (WHO) as “highly toxic and can cause reproductive and developmental problems, damage the immune system, interfere with hormones and can cause cancer”. Dioxins are classified as Persistent Organic Pollutants and any analysis of potential receptors

should include local businesses such as the Sowerby Bridge Day Nursery which is just down-stream from CVSH.

#### Flooding

The Calder Valley Skip Hire site at Belmont is situated adjacent to the River Ryburn, and has suffered flooding on numerous occasions. The Government's Flood Risk Checking Service shows:

The area around Calder Valley Skip Hire Ltd, Sowerby Bridge, HX6 3LL has a:

high risk of surface water flooding

medium risk of flooding from rivers and the sea

There is insufficient evidence to suggest that this flooding can be either eliminated or adequately mitigated. Any potential flooding of the site, which is possible from both surface water and river flooding, could be disastrous for the river and its ecosystems. Furthermore, we understand the flood bund, which CVSH installed on the site along the riverbank following a previous flooding incident, has a gap to allow surface water to leave the site. This would surely render it ineffective in the event of a flood incident involving raised river levels.

#### Insufficient data modelling

The applicant has used evidence from two sets of computer-modelling to support the application. One model shows the temperature distribution and residence time within the combustion chamber in order to show that a high enough temperature is reached for long enough to reduce dioxins, furans and particulates within the gas flow to acceptable levels for the emissions. A

second computer-modelling programme is used to simulate the dispersion of those emissions. In both cases these models only show results for a prescribed set of input conditions. They do not represent real world conditions which are variable and subject to abnormal or unforeseen events.

The combustion modelling is also based on typical Refuse Derived Fuel (RDF) waste composition. This requires careful sorting and segregation which relies on human intervention to obtain the correct mix of materials. The actual RDF is likely to have significant variations, thus rendering the combustion

modelling unreliable.

In addition, Inspector Woolcock noted in his report:

9. Because of an error at the planning application stage in the AOD of the proposed stack, a previous run of the model inadvertently assessed a stack height 9 m higher than the correct discharge height.<sup>40</sup> The results from this modelling do not provide any reassurance about the robustness of the stack height calculation now relied upon by the appellant because that run of the model also dealt with the trees solely by means of surface roughness length.

#### Weather Statistics

Weather data has been used for the dispersion modelling. The data used has come from Leeds Bradford Airport and Bingley. Leeds Bradford Airport is 20 miles away, and at an elevation of 208m it is England's highest airport, with a totally open aspect in all directions. The site of the proposed incinerator, in a heavily wooded, narrow valley bottom is not comparable in any way.

We would therefore argue that this renders the dispersion modelling analysis invalid.

In addition, the local topography is such that predicting dispersion in the bottom of a narrow valley is extremely complicated and normal dispersion rules do not apply. The incinerator lies in the shadow of Norland Moor which is at 280m elevation and causes a unique set of conditions. Dispersion is further complicated by the height of trees surrounded by the site.

The Ryburn Valley is known locally for its Inversions, which cause low-lying cloud to remain in the valley for hours and sometimes days. During the fire on the CVSH site in 2017, the smoke lingered for several days. This gives a clear illustration of the effects of smoke in the valley, and it is reasonable to assume that any fumes from the incinerator would behave in the same way.

#### Environmental Impact:

According to UKWIN (UK Without Incineration Network), a national crossparty group who are calling for a moratorium on all new incinerators in England (Scotland and Wales having already passed such a moratorium), every tonne of waste that is incinerated emits one tonne of carbon dioxide into the atmosphere, approximately half of which is derived from fossil fuels.

In addition, the UK already has more incinerator capacity than it needs, and in the vast majority of regions, more waste is sent to incinerators than is recycled. There is a clear comparison to be drawn between the rise of incineration rates and a decrease in recycling rates. The proposed incinerator would create a further capacity of 10,000 tonnes, which when burnt would release 10,000 tonnes of carbon dioxide into the atmosphere and would inevitably have an impact on recycling rates locally.

#### Competence of the Operator

The Council must refuse an application for an environmental permit if it considers that the applicant will not operate the regulated facility in accordance with the permit.

Unfortunately, Calder Valley Skip Hire has a poor relationship with its neighbours who allege that they have failed to abide by existing conditions resulting in hundreds of complaints. Council Officers had to intervene in 2015 after large stockpiles of waste accumulated on the Belmont site, causing a foul stench to linger throughout Sowerby Bridge. Furthermore, there was a large fire on the site in 2017, and smoke from this lingered in the valley for several days, as noted previously in our objection.

Guidance for Council Officers on the competence of an operator can include circumstances where the Council believes that the operator lacks the management systems or competence to run the installation according to the application or any permit conditions.

#### Conclusion:

We believe that the combination of insufficient data modelling, unreliable data used from inappropriate sources, and the concerns raised by Inspector Woolcock should be sufficient reasons to reject this and all subsequent applications for an environmental permit at this site.

Yours sincerely.

XXXXX

430

TWIMC,

I thoroughly object to the current plans of building an incinerator in the Sowerby Bridge area. I live on XXXXX and I am already concerned about the poor air quality me and my XXXXX have to breathe in and around the Sowerby Bridge area due to the near constant traffic, and the sewage treatment centre in Copley.

Building this incinerator would seriously make me consider moving out of the area.  
Please decline the application.

Kind regards  
XXXXX

431

To Whom it may concern.

As a local resident living in XXXXX which is XXXXX we would like to object to the application in all and any form due to the air pollution which will directly affect our air quality being XXXXX.

Having this in the bottom of a valley with little or no chimney space above the plant will allow the fumes and particles to gather in the atmosphere outside XXXXX.

We strongly object to the plant and wish Calderdale Council to desist in allowing further applications to take place and confirm that the matter be considered final, and that the incinerator will not be allowed to function in any way.

Yours Sincerely,

XXXXX



432 To Whom it may concern.

I would like to register my objection to the proposed waste incinerator plant at Calder valley skip services.

I cant believe this is being proposed again! How many times do we have to go through the stress and the threat to peoples health this proposal will generate.

It is now really starting to effect my mental health as well, why do we have to keep revisiting this year after year? Is the applicant allowed to just keep on applying until we all lose the will to live and submit to his greed?

The site is totally unsuitable for the use proposed for the following reasons:-

1. The site is at the bottom of a steep sided valley which means in low wind conditions the smog coming out wont dissipate and will hang around. This will contain heavy metals and dioxins and will more than likely smell as well.
2. The current traffic entering the site has problems with access to it (38 Tonne Lorries trying to reverse in causing traffic to back up), this wont be any better when operating 24/7 365 days a year!
3. There are residential properties level with the top of the proposed flue, straight into their breathable air. (sitting out in their gardens in summer will be fun!)
4. The proposed site is in an area of natural beauty next to the old train line. This is used by walkers and mountain bikers regularly for exercise. The proposal of the incinerator will make this a no go area unless you want to breath in god knows what.
5. The incinerator is within a stones throw of Sowerby bridge town centre, which already has a high air pollution problem from traffic (especially when the M62 is closed) the local bars and restaurants with sit out areas will lose a lot of trade as a result of the added pollution and smell.
6. The added traffic of HGV's will damage the already heavily potholed road in and around the site, will Calder Valley Skips pay for the upkeep of the roads (very Unlikely)

I am not against the idea of waste incinerators if they are in the correct location, a better place for this proposal would be next to junction 22 of the M62, high up with good wind flow to dissipate the emmisions.

Please do not approve the application. If this goes ahead it will subject the local community to 20+ years of potential health risks from the emissions generated.

Your sincerely XXXXX  
Sent from Mail for Windows

433 We are writing to place on record our strong and continued objection to the application for the proposed incinerator being made by Calder Valley Skip Hire in Sowerby Bridge.

We have lived at XXXXX for over XXXXX years and in recent years we can smell the nasty smell coming from the waste/burning when we walk outside of our house. On some days we can smell this in the house if our windows are open. As our house is in a raised elevation position XXXXX, we regularly see low clouds/haze which hangs low in the valley in the early morning. The cloud will retain the air pollution over the valley and have a direct impact on residents in terms of air quality. This is just what we can physically see, the air quality is unseen but we can smell the pollution. What is proposed appears to be the direct opposite of what environmental legislation tells us you should be doing and contravenes the Environment Act, which became law in 2021.

‘Cleaning up our toxic air protects the health of UK citizens, but also makes sense for the financial health of the country too. The Royal College of Physicians has estimated that the social cost of air pollution to individuals and the health service is over £20bn annually in the UK. Similarly, the Confederation of British Industry estimates that a £1.6bn annual economic benefit to the UK could be realised by meeting WHO guidelines.’ ([www.clientearth.org/latest/news/why-the-uk-environment-bill-matters/](http://www.clientearth.org/latest/news/why-the-uk-environment-bill-matters/) 2024)

This proposed development will be detrimental to the whole valley, the smell, safety, air pollution and no doubt increased traffic being a number factors to be affected.

This application was originally made in August 2020 and refused at appeal by a Government Inspector in July 2023. If a qualified inspector can refuse this application, see his report for his stated reasons, and the Council are refusing to vote, how can the decision of Council Officers be acceptable.?

We strongly believe that residents' health should be the main priority here as opposed to commercial profiteering. We have to back words with action and reject this application for good.

XXXXX

434

Dear Sirs

Once again I am strongly objecting to the planning application by Calderdale Skip Hire for an incinerator at there Belmont works on Rochdale Road. 😞 😞

The site is by some lovely woods which is full of wild life and some lovely walks .

Before it was bought by the Skip hired used to walk down the little road with my grandchildren but because of the wagons I longer feel safe in doing so .

Last year I took my sons dog across to the woods and he ran in the little bit behind stone building and came back covered in black oil .Where did that come from .

Also the river runs behind the works .

The atsmosphere will be polluted with the debris from the flu never mind the smell .We will have to keep our windows shut 😞

What will happen in dry weather if sparks fly out bang the beautiful woods may be set on fire ,how will that be contained ,never mind the small gas station .

There are lots of homes that will be affected .

Also how many more wagons will come on the already busy Road never mind the noise .

It has already been denied so what's the difference now ,have they found some dodgy councillors to back them ,in this day and age I wouldn't be surprised.

During COVID these Woods were a safe place for people to walk .

To end this remember a few years ago there was a fire on the site which resulted in the fire service being in attendance for a week to make sure it didn't spread .

So come on you councillors on planning please deny the application for future humans animals and birds to be safe

Yours Sincerely

XXXXX .

Ps I would be grateful for an acknowledgment to this email so I know you have received it and READ IT and not swept it under the carpet 😞

435

To whom it may concern

I would like to formally object to the proposed plans to let an incinerator at calder valley skip hire in sowerby bridge. I believe this would pose a significant risk to health for those who live in the valley. It is not a suitable location for the incinerator, with it being positioned within tree coverage at the bottom of the valley, very close to both housing and businesses. Living so close to the site I am worried about the possibility of being unable to open windows in my property due to smoke and fumes within the valley.

I do hope this plan will be again refused, and preferably not allowed to apply again

Many thanks

XXXXX

436

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

I've copied the above from another objector, because I couldn't have said it any better. I've lived at XXXXX for XXXXX years and developed asthma XXXXX years ago at age XXXXX! I certainly don't want this application decision to be passed as I truly believe it will be detrimental to my own health and to others.

Yours,

XXXXX

437	<p>Dear Sirs</p> <p>As a resident of XXXXX,</p> <p>I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.</p> <p>The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.</p> <p>This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.</p> <p>The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.</p> <p>Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.</p> <p>Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.</p> <p>How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?</p> <p>The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.</p> <p>Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.</p> <p>Yours faithfully</p> <p>XXXXX</p>
438	<p>To whom it may concern,</p> <p>I, XXXXX, and my wife XXXXX, residing at XXXXX</p> <p>Object in the strongest manner possible with regard to the application by Calder Valley Skip Hire for a permit to operate a waste incinerator</p> <p>in our already polluted town. As residents of XXXXX we have the right to breathe clean air and trust that the council officers will deny them this permit.</p> <p>XXXXX</p>



439	<p>Dear sir/madam,</p> <p>I am writing to object in the strongest possible terms to this company building a waste incinerator in the Ryburn Valley. My main objection to this is the pollution this will cause, due to the unique topography of our valley, which means that any polluted air will, literally, 'hang around' at a low level.</p> <p>This site is in a semi-rural area, with woodlands right next to it.</p> <p>The pollution will harm this woodland and the wildlife that depend on it, as well as the people who live, work, walk and visit in the area. There are several schools within a couple of miles of this site, with hundreds of children who will be affected by the reduced air quality this incinerator would create.</p> <p>The noise created by the site would increase substantially if the site were to be allowed to operate for 24 hours, and this would further reduce the quality of life for local residents.</p> <p>As a community, we have been fighting against the building of this incinerator for 8 years now, and many reports have been given, hearings have been heard, and complaints have been made. Surely it is time for this ridiculous plan to be quashed once and for all? This is such a waste of resources, time, and money.</p> <p>Yours, XXXXX</p>
440	<p>I would like to register my objection to the renewed application for a permit to operate a waste incinerator in Sowerby Bridge.</p> <p>Calderdale Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience. The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 which was the decision of a judicial review.</p> <p>This application should be turned down once and for all. It will greatly affect air quality in an environment where many thousands of people live, work and go to school. The only people to benefit if this is allowed to go ahead is one privately owned company. A business shouldn't ever be more important than the health of thousands of people.</p> <p>Kind regards</p> <p>XXXXX</p>

441

To whom it may concern,  
ENVIRONMENTAL PERMIT APPLICATION, CALDER VALLEY SKIP HIRE  
LTD: REF: S13/006

We are writing again regarding the latest application for an environmental Permit for the operation of a Small Waste Incinerator Plant (SWIP) at Calder Valley Skip Hire's Belmont site. We wish to object to this latest application in the strongest possible terms.

We are extremely concerned about the environmental impact the incinerator would have at this location and call on the council to refuse the application. In particular, we wish to note the following points:

#### Inability to Enforce Permit Conditions

The new application operations on the Belmont site would be governed by two separate permits, one relating to the SWOP and the broader EA permit. When CVSH applied for a permit for a site at Mearclough, Calderdale's Cabinet refused this, citing "concerns about the enforceability and any related concerns in a situation where operations on the site are governed by two separate permits; Having considered both legal advice and information from Defra, it is concluded that there is insufficient certainty about the ability of the council to enforce permit conditions...". This argument applies equally to the situation at Belmont, and therefore the Permit should be refused.

#### Impact on Air Quality

The site is wholly unsuited for the burning of waste, being in a steep sided, heavily wooded, densely populated valley, very close to an Air Quality Management Area (AQMA) as well as being within 2km of a dozen schools. Recreational areas, homes and businesses are all within the immediate vicinity. The air quality through the nearby Sowerby Bridge town centre is already very poor, with levels of pollutants regularly exceeding lawful limits. There is evidence to suggest that the operation of the incinerator would exacerbate the pollution problem in the valley, with an increase of NOx and small particulate matter, which would worsen the health of local residents. Indeed, in his judgement of 5th July 2023, Inspector John Woolcock concluded:

“ Taking all the above into account, I consider that the appeal should be dismissed because I am not satisfied on the evidence adduced that the proposal complies with IED Article 46 1., which requires that waste gases from waste incineration plants and waste co-incineration plants shall be discharged in a controlled way by means of a stack the height of which is calculated in such a way as to safeguard human health and the environment. Furthermore, I am unable to find that the necessary measures have been taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

The incidence of lung disease in Calderdale is notably higher than the rest of West Yorkshire, and around 4.5% of all adult mortality in Calderdale is estimated to be due to the long term exposure to harmful particulate air pollution. The borough ranks amongst some of the worst local authorities in the country for premature death rates due to respiratory disease.

The council has a duty to work to reduce air pollution, and therefore should not grant an application that may well worsen the problem. When Calderdale Council refused the Mearclough application in 2018, the reasons for refusal stated: It is accepted that there is no safe level of NOx and it is accepted that the SWIP site could impact on an AQMA. The application does not provide reasonable grounds to believe that it will not lead to an increase in NOx levels within the locality, but again there is no certainty that any action could be taken in the event of a breach.” The Belmont site is equidistant to the Sowerby Bridge AQMA, and therefore this statement applies equally to the current application as to the former.

#### Health Impacts

Dioxins are produced when burning Refuse Derived Fuel (RDF) and are described by the World Health Organisation (WHO) as “highly toxic and can cause reproductive and developmental problems, damage the immune system, interfere with hormones and can cause cancer”. Dioxins are classified as Persistent Organic Pollutants and any analysis of potential receptors

should include local businesses such as the Sowerby Bridge Day Nursery which is just down-stream from CVSH.

#### Flooding

The Calder Valley Skip Hire site at Belmont is situated adjacent to the River Ryburn, and has suffered flooding on numerous occasions. The Government's Flood Risk Checking Service shows:

The area around Calder Valley Skip Hire Ltd, Sowerby Bridge, HX6 3LL has a:

high risk of surface water flooding

medium risk of flooding from rivers and the sea

There is insufficient evidence to suggest that this flooding can be either eliminated or adequately mitigated. Any potential flooding of the site, which is possible from both surface water and river flooding, could be disastrous for the river and its ecosystems. Furthermore, we understand the flood bund, which CVSH installed on the site along the riverbank following a previous flooding incident, has a gap to allow surface water to leave the site. This would surely render it ineffective in the event of a flood incident involving raised river levels.

#### Insufficient data modelling

The applicant has used evidence from two sets of computer-modelling to support the application. One model shows the temperature distribution and residence time within the combustion chamber in order to show that a high enough temperature is reached for long enough to reduce dioxins, furans and particulates within the gas flow to acceptable levels for the emissions. A

second computer-modelling programme is used to simulate the dispersion of those emissions. In both cases these models only show results for a prescribed set of input conditions. They do not represent real world conditions which are variable and subject to abnormal or unforeseen events.

The combustion modelling is also based on typical Refuse Derived Fuel (RDF) waste composition. This requires careful sorting and segregation which relies on human intervention to obtain the correct mix of materials. The actual RDF is likely to have significant variations, thus rendering the combustion

modelling unreliable.

In addition, Inspector Woolcock noted in his report:

9. Because of an error at the planning application stage in the AOD of the proposed stack, a previous run of the model inadvertently assessed a stack height 9 m higher than the correct discharge height.<sup>40</sup> The results from this modelling do not provide any reassurance about the robustness of the stack height calculation now relied upon by the appellant because that run of the model also dealt with the trees solely by means of surface roughness length.

#### Weather Statistics

Weather data has been used for the dispersion modelling. The data used has come from Leeds Bradford Airport and Bingley. Leeds Bradford Airport is 20 miles away, and at an elevation of 208m it is England's highest airport, with a totally open aspect in all directions. The site of the proposed incinerator, in a heavily wooded, narrow valley bottom is not comparable in any way.

We would therefore argue that this renders the dispersion modelling analysis invalid.

In addition, the local topography is such that predicting dispersion in the bottom of a narrow valley is extremely complicated and normal dispersion rules do not apply. The incinerator lies in the shadow of Norland Moor which is at 280m elevation and causes a unique set of conditions. Dispersion is further complicated by the height of trees surrounded by the site.

The Ryburn Valley is known locally for its Inversions, which cause low-lying cloud to remain in the valley for hours and sometimes days. During the fire on the CVSH site in 2017, the smoke lingered for several days. This gives a clear illustration of the effects of smoke in the valley, and it is reasonable to assume that any fumes from the incinerator would behave in the same way.

#### Environmental Impact:

According to UKWIN (UK Without Incineration Network), a national crossparty group who are calling for a moratorium on all new incinerators in England (Scotland and Wales having already passed such a moratorium), every tonne of waste that is incinerated emits one tonne of carbon dioxide into the atmosphere, approximately half of which is derived from fossil fuels.

In addition, the UK already has more incinerator capacity than it needs, and in the vast majority of regions, more waste is sent to incinerators than is recycled. There is a clear comparison to be drawn between the rise of incineration rates and a decrease in recycling rates. The proposed incinerator would create a further capacity of 10,000 tonnes, which when burnt would release 10,000 tonnes of carbon dioxide into the atmosphere and would inevitably have an impact on recycling rates locally.

#### Competence of the Operator

The Council must refuse an application for an environmental permit if it considers that the applicant will not operate the regulated facility in accordance with the permit.

Unfortunately, Calder Valley Skip Hire has a poor relationship with its neighbours who allege that they have failed to abide by existing conditions resulting in hundreds of complaints. Council Officers had to intervene in 2015 after large stockpiles of waste accumulated on the Belmont site, causing a foul stench to linger throughout Sowerby Bridge. Furthermore, there was a large fire on the site in 2017, and smoke from this lingered in the valley for several days, as noted previously in our objection.

Guidance for Council Officers on the competence of an operator can include circumstances where the Council believes that the operator lacks the management systems or competence to run the installation according to the application or any permit conditions.

#### Conclusion:

We believe that the combination of insufficient data modelling, unreliable data used from inappropriate sources, and the concerns raised by Inspector Woolcock should be sufficient reasons to reject this and all subsequent applications for an environmental permit at this site.

Yours sincerely,

XXXXX

442 Dear Sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,

XXXXX

443 Good Afternoon,

I'm writing to raise an objection to the Sowerby Bridge Incinerator planning application.

As a mother to a 2 year old and also pregnant with my second child, living in Norland directly above the Calder Valley Skip Hire site fills me with fear.

Firstly this is a repeat application of one that has already been rejected, with no practical changes to the new application. Immediately this suggests that the outcome should be the same and it should be rejected. The fact that it was previously voted on and this time is not subject to a vote is highly concerning and raises huge questions around the transparency of the process.

This application for an incinerator that will release an untold amount of fumes in a valley where clouds and mist sit for days is a terrible idea, particularly for the health and clean air of the valley. Sowerby Bridge is already an Air Quality Management area so the idea of adding further fumes and noxious gases completely goes against the goals of Calderdale's clean air campaigns (such as Let's Clear The Air). I have added two pictures taken over two years from my house showing how clouds in the valley don't disperse, the fumes from a 24 hour incinerator will be no different. The one main suggestion of the Environmental Inspector to the previous application was to increase the chimney stack height to a safe level as it doesn't even reach above the trees, never mind roads - the stack height has not changed between applications so why should the response to the application?

There is no benefit to the community or to the environment to approve this or future applications for an incinerator. There is sufficient incinerator capacity in the area without adding further, therefore this is solely an application to improve Calder Valley Skip Hire's profit at the expense of the environment and the public. I implore you to reject again for the sake of the community's, mine and my children's health.

Kind Regards,

XXXXXX



444

I object!

I object on the ground of not only health but environmental we live in an inverted V shape meaning that all the debris and debris and smog that is going to be released from that chimney is going to come straight down into the valley bottom affecting all the people that live here, affecting all the schools and children that growing up here.

There is nowhere in the UK that is simile to Calderdale for its unique valleys hence no model we can compare it against for environmental or human health damage. Previous the pollution and environment factors have been compare against compare that of airport at Leeds Bradford is not acceptable. Leeds Bradford is on the top of the hill and not situated right in the middle of a residential area.

Councils are not even going to vote on this matter it has been reported during a public meeting, one that the council did not attend to explain anything.

The planing permission had been thrown out, reapplied for and thrown out by the environmental office in government. I do not understand how they are able to be applying again.

I am objecting and this permit should NOT be allowed it be applied for again.

XXXXX

445

To whom it may concern,

I am writing to express my strong objection to the proposed SWIP at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge HX6 3LL.

As a XXXXX, which includes Belmont Industrial Estate, it is my responsibility to ensure that the local community's health is protected. Overall, the Environmental Permit should not be granted because it was confirmed at the last Appeal in 2023 that the proposed Incinerator would be a risk to 'human health'.

Additionally, I am in full agreement with the local residents' objections to the Environmental Permit. The proposed plant fails to meet the Statutory Standards, and the Permit Application does not comply with the applicable regulations and guidance.

My concerns about the proposed plant also include the risk of explosion or fire due to inadequate equipment storage, potential flooding on the site, and the risk of emissions polluting local schools.

As a XXXXX, I urge the Council to deny the Environmental Permit.

Thank you for your attention to this matter.  
Respectfully, XXXXX

446

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at the Belmont site in Sowerby Bridge.

It is an environmental permit so insufficient stack height, site specific temperature inversions preventing air pollution dispersion, noise from traffic on site (not going to or from site) excessive in a populated valley and the need for impartial expert advice are arguments the council officers should act on.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Very best wishes

XXXXX

Sent from Outlook for Android

447	<p>I object!</p> <p>The planing permission had been thrown out, reapplied for and thrown out by the environmental office in government. I do not understand how they are able to be applying again.</p> <p>I object on the ground of not only health but environmental we live in an inverted V shape meaning that all the debris and debris and smog that is going to be released from that chimney is going to come straight down into the valley bottom affecting all the people that live here, affecting all the schools and children that growing up here.</p> <p>There is nowhere in the UK that is simile to Calderdale for its unique valleys hence no model we can compare it against for environmental or human health damage. Previous the pollution and environment factors have been compare against compare that of airport at Leeds Bradford is not acceptable. Leeds Bradford is on the top of the hill and not situated right in the middle of a residential area.</p> <p>Councils are not even going to vote on this matter it has been reported during a public meeting, one that the council did not attend to explain anything.</p> <p>I am objecting and this permit should NOT be allowed it be applied for again.</p> <p>XXXXX</p>
448	<p>Dear Sirs,</p> <p>I wish to state very strongly my objections to the proposal for the above plant.</p> <p>I agree with the letter sent by Holly Lynch MP, which states clearly the following information.</p> <ul style="list-style-type: none"> <li>- uncertain that the council can enforce permit conditions</li> <li>- the site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution</li> <li>- the site is at risk from flooding</li> <li>- insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict</li> <li>- competence of CVSH to run such a plant.</li> </ul> <p>XXXXX</p>
449	<p>To whom it may concern.....it doesn't seem two minuets since I objected before to a Incinerator at Belmont or anywhere else in the Calder Valley. The reasons I gave last time were that both my husband and I have respiratory problems mine being Asthma and my husband having COPD.We are a small number of thousands of other sufferers in our area. So I</p>

am speaking up for the masses....if this does get passed and goes ahead I only hope your Public Liability covers all the claims you'll be getting for deterioration of peoples health .Yours sincerely XXXXX

450

Dear Sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

Two years ago the said company who is applying for an incinerator at Belmont. I remember when they had a fire and our car which was parked at XXXXX it was covered in flies as was other cars. Also the fumes that we had to invest was not healthy at all. I myself suffer from a chest ailment it was not good for my health.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers in a result.

Waste should not be incinerated – it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours faithfully

XXXXX

451 Good Afternoon,

I'm writing to raise an objection in the strongest terms to the Sowerby Bridge Incinerator planning application.

Firstly placing an incinerator at the bottom of a valley where air cannot properly dissipate is an awful idea and will negatively affect many people's health. The incinerator stack does not clear the valley (or even the trees) and therefore harmful fumes will remain where they are, drifting up and down the valley into Sowerby Bridge itself and the surrounding areas (where many schools are located). The modelling provided for the fumes is inappropriate and based on weather patterns that are nothing like what happens in the valley. Accurate modelling if it were available would show that the fumes have nowhere to go. Sowerby Bridge is already an Air Quality Management Area, this does not make any sense from a Net Zero ideology (which Calderdale Council purports to be advocating for).

Calderdale Council will have very little idea what's being burnt in the incinerator and the application provides very little control, how can we be certain they're burning only what they're meant to? Also given Norland is struck by significant levels of surface water in heavy rain due to the stone foundations, the incinerator site is a flooding risk. How will the site be able to stop the harmful waste flowing into water supplies when it inevitably gets flooded?

Please reject this application and ensure future applications for an incinerator on this site cannot be submitted, it is a wholly inappropriate location for an incinerator and if this is accepted will demonstrate that Calderdale Council have no interest in its constituents' health or the local environment, only profit.

Kind Regards,

XXXXX

452	<p>To whom it may concern,</p> <p>I am writing in strong objection to the plans for an incinerator at calder Valley skip hire.</p> <p>The impact this would have on air quality, the lives of young and old in the area and the plummet in house prices in the local area would be detrimental.</p> <p>We have a town attended by tourists every summer, especially along the canal, and those having canal holidays. It would put so many people off visiting our beautiful area.</p> <p>Its appalling they have been allowed to submit planning over and over.</p> <p>I hope the collective concerns of residents are taken seriously.</p> <p>Kind regards XXXXX</p>
453	<p>I WOULD LIKE TO STRONGLY OPPOSE AND OBJECT TO THE PRPOSED INCINERATOR BY CALDER VALLEY SKIP HIRE</p> <p>MY OBJECTIONS AS A LOCAL RESIDENT ARE BASED ON THE HEAVY EMISSIONS, FUMES AND ADDITIONAL CONCERNS FOR FUTURE HEALTH WITH ANY FUMES FROM THE PROPOSED INCINERATOR. ALSO ANY NOISE AND ADDITIONAL TRAFFIC IMPLICATIONS TO AN ALREADY HEAVILY USED AND CONGESTED AREA.</p> <p>XXXXX</p>
454	<p>I'm writing to register my strong objection to the proposed siting of the proposed incinerator at Sowerby Bridge.</p> <p>This would be detrimental to the health of residents and to the environment.</p> <p>Yours, XXXXX</p>



455 I write to oppose the incinerator in Sowerby Bridge.

The impact on human health and the environmental impact must be seriously considered.

There is high air pollution already within the town with the bottleneck of traffic that travels through the town. The impact of more and more wagons coming through with waste will make this worse.

The frightening thought of the noxious fumes and gases that would be omitted is causing heightened anxiety for healthy and poorly residents within the Sowerby Bridge Community. Whilst Belmont is in the bottom of the valley, the smoke, smell and noise rises impact those living higher up than the incinerator.

I myself have a father with lung cancer and Parkinsons disease. For the people of the community that are housebound, they will be robbed of fresh air, not even able to open their windows due to the smog, smoke and smell that rises up. Further to this the noise that will this will cause, even the annoying constant hum causes sleep deprivation impacting on not only poorly people but people who have vital jobs in the community. What would these people think if those who provide vital services and assistance were unable to attend work and keep services going because they were ill, tired and stressed because of the impact of the incinerator.

The amount of schools in the area and the investment they have put into having the likes of Forest schools and other outdoor activities to promote healthy minds and omit mental health in children will be totally blighted and disregarded. The children of the community will be ones that suffer in this also.

I really hope that the voices of those that have raised all these concerns are listened to.

Surely there could be a more suitable location in a non residential area that could be sourced! It would be interesting to learn if the people that are wanting this would be happy for the impact of this should they reside in this area?

Regards  
XXXXX

456 Dear Sir/Madam,

I am writing to you to raise our objections to the incinerator plant proposed by Calder Valley Skip Hire.  
We both strongly object to this proposal.

Many Thanks,  
XXXXX

457 As a resident of XXXXX I would like to be bounted in the objection of an incinerator in the town.  
The smell smoke and noise rises from the town up into the villages above.  
I feel that this would impact on my health which is failing with lung cancer and Parkinsons disease.  
I often open my windows as I am housebound in an upstairs property. I would not be able to do this with the noxious  
gases and air pollution without seriously affecting my health. This will put extra strains on medical services if I need extra  
help for breathing. The noise will also impact me being able to sleep which again is vital for my volition.  
XXXXX

458 Afternoon

OBJECTION to Environmental Permit Application, Calder Valley Skip Hire Ltd Ref: S13/006

I object on the following ground

- uncertain that the council can enforce permit conditions
- the site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution. I live in the valley where Sonoco are based. Their output is only condensation but on most days it can be seen to hang in the valley and ride along the valley bottom rather than be blown up and away
- the site is at risk from flooding
- insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict
- competence of CVSH to run an incinerator
- tourist hotspot. I don't think tourists will want to come to a valley that smells and hangs with smoke. They may want to visit the valley that Anne Lister came from but they certainly don't want it in real time smelly vision!

To grant a permit would be a step backwards in time!

Submitted by XXXXXX

459 Sir, we wish to object to the planning application for the incinerator plant at the Belmont site. We believe it will be harmful to our health due to its pollution, and also to our lives due to increase in H.G.V 24 hours per day. XXXXX

460 Good evening

I wish to object to the application for a permit by Calder Valley Skip Hire for an incinerator.

My family and neighbours have a right to clean air. The potential health and well-being impact on local people and wildlife is an unacceptable risk for commercial profit.

In a case where the permit were granted and it could be proved that this led to health conditions and illnesses, the council could be held liable for damages which would also not be in the interests of the taxpayer.

I sincerely hope you will take these points into careful consideration when making your decision.

Many thanks  
XXXXX

461 Triangle incinerator.

Hi I want to forward myself as a complainant again the incinerator that is proposed, I have copd and moved to ripponden for the fresh air, I don't want to end up in hospital with breathing problems just so a skip company can burn rubbish, and right near a school!!!.. what are people thinking of proposing this in a semi rural area, my friend councillor XXXXX also is against the idea as it will effect a very large area, especially close by in ripponden too, I can't afford to move again, my husband has terminal lung cancer too , it's going to kill us off 😞  
. Were only in our 40s!!

XXXXX

462 Hi,

I would like to strongly voice my objection to the application for an environmental permit to operate an incinerator by Calder valley skip hire.

I am highly concerned as a local resident about the environmental impact particularly in relation to air quality.

XXXXX

463	<p>I strongly object to the application for this incinerator. The planning application has already been refused by a Government Inspector who stated that they couldn't find how the waste would be discharged in a controlled way so as to safeguard human health and the environment! Why is that not good enough?</p> <p>Why are we having to go through this again?</p> <p>The incinerator will benefit no one other than the operators who seem to totally disregard the residents of the area and the environment.</p> <p>The same objections still apply and indeed are exacerbated by the increased traffic through Sowerby Bridge, particularly when there are diversions from the M62 . The pollution is awful.</p> <p>I cannot understand how this application can be reconsidered, all local Councillors, of all political parties, two local MPs and residents are opposed to this threat to our absolute right to breath clean air.</p> <p>XXXXX</p>
464	<p>Dear Sirs</p> <p>As a resident of Sowerby Bridge,</p> <p>I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.</p> <p>The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.</p> <p>This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.</p> <p>The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.</p> <p>Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.</p> <p>Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.</p> <p>How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?</p> <p>The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.</p> <p>Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.</p>

Yours faithfully  
XXXXX

465 NO NO NO TO INCINERATOR

XXXXX

466

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours, XXXXX

467 I, XXXXX of XXXXX formally object to the latest Calder Valley Skip Hire Permit Application for a Small Waste Incinerator Plant (SWIP) in Sowerby Bridge ref. S13/006

I object for the following reasons:

1. An original SWIP Permit application (APP/EPR/603) was turned down in 2018 on the basis of insufficient evidence to guarantee air quality for residents and surrounding businesses, in that it could not be guaranteed that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.
2. A virtually identical Permit application of August 5th 2020 SWIP was refused at appeal on the 5th July 2023 by Government Planning Inspector John Woolcock. The Government Planning Inspector refused a permit stating he was “unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”
3. The virtually identical Permit application of August 5th 2020 SWIP (refused at appeal) totally relied 100% on an ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools.
4. The current new application ref. S13/006 of Feb 20th 2024 relies totally 100% on the same ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools.
5. The current new application ref. S13/006 of Feb 20th 2024 has the same height and size of waste gas exhaust



discharge stack and appears to be a resubmission of the application dated Aug 5th 2020 but with added information stated as an 'independent review' by RPS on behalf of CVSH. The independent review was done by CERC (Cambridge Environmental Research Consultants) to verify the treatment of trees within the air quality assessment by RPS.

The review should not be taken into consideration and the permit application should be refused as it does not contain an "independent" review. CERC are the producers of the ADMS air modelling software that RPS used for this application. CERC have a vested interest in not showing up problems with their software or upsetting their customers (CVSH).

The CERC report should be disregarded as unreliable in that it stated that 'the approach adopted within the air dispersion modelling is considered appropriate and there are no other suitable models/software available'; when this is not the case and other suitable models/software are available.

6. The ADMS computer model data put forward in the permit application is not fit for purpose in that it has seriously not taken into account the effect of the specific weather condition of inversion in a valley bottom; it has only taken into account the condition of inversion with regard to weather data programmed for the flow and dispersion of waste gases from a hill top exhaust stack as located at Yeadon Airport.

Inversion being deviation from the normal change of an atmospheric property in comparing the flow and dispersion of waste gases from a low valley bottom in close proximity trees and buildings, with the high altitude of an open hill top site as per weather data used for the permit application submitted.

As the application for the Permit relies 100% on the computer model, the permit application should once again be refused as being incorrectly assumptive and as such inaccurate in not taking into account the site being located in a valley bottom with a history of detrimental inversion.

As such the ADMS computer model data as submitted is unsafe in its attempt to guarantee safeguarding of human health and the environment.

7. The proposed Incinerator site and waste exhaust fume plume smoke stack is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2) and is identified as subject to a Council and local Environmental Health initiative to improve the air quality.

The permit should be refused given the historic evidence of smoke and low cloud hanging in the valley bottom due to the unique terrain which is the exact opposite of the computer model figures from Yeadon Airport, the waste exhaust fumes

from the proposed smoke stack would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

8. As the proposed Incinerator site is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2), the additional travel to and from the site through Sowerby Bridge of extra diesel fuelled waggons transporting 2 tonnes per hour (Monday to Friday for 52 weeks per year) and then re-transporting away the non-combustible waste to landfill; would in the first instance further add to the already damaging traffic congestion and in the second instance damage even further the air quality of Management Area, (AQMA2)

The permit should be refused as the extra traffic throughput, poisonous exhaust fumes and congestion would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

9. With regard to monitoring; the August 2020 CVSH permit application states "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time."

The January 2024 application by CVSH should be refused as CVSH have removed the statement "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time."

The Permit should also be refused as there would be a restriction if not an impossibility for CMBC to continuously monitor emissions to air in order to confirm that levels are within IED emission limits, given the removal of the power of CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time.

As such the permit application does not fulfil its obligation in guaranteeing that necessary measures will be taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

10. The new application report dated 26 Jan 2024 submitted by RPS on behalf of CVSH states that the refusal at appeal decision by Government Inspector John Woolcock is "perverse" and "procedurally unfair" but yet did not take up their option to take it to Judicial Review.

The permit application should be refused as it appears both perverse and procedurally unfair of CVSH in submitting what they state is basically the same application as in 1.5.5 in the new application report.

The permit application should furthermore be refused as it appears to be abuse of process by CVSH in not taking their option to take the original appeal decision to Judicial Review, but alternatively submitting what CVSH state is basically the same application on 20th Feb 2024 as was refused some 7 months later on 5th July 2023 by Government Inspector John Woolcock.

Summary

A. A previous permit virtually the same as the Feb 2024 application which included provisions for CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time, was turned down in 2018 on the basis of insufficient evidence to guarantee air quality for residents and surrounding businesses, in that it could not be guaranteed that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.

B. A previous permit virtually the same as the Feb 2024 application which included provisions for CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time, was refused at appeal by an independent government officer on the 5th July 2023 by Government Planning Inspector John Woolcock who stated he was “unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”

The latest application dated Feb 2024 is essentially the same application as the one turned down in 2018 and virtually the same as the one refused at appeal on 5th July 2023 but with s CVSH have removed the statement “CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time.”

### Conclusions

Firstly the latest permit application should be rejected as it still categorically fails to guarantee that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.

Secondly the latest permit application should be rejected as it still categorically fails to guarantee that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”

Thirdly the latest permit application should be rejected as it would essentially allow CVSH to pump waste exhaust gases at the rate of burning two tonnes per hour into the environment 670 m from nearby Air Quality Management Area 2 Monday to Friday for 52 weeks per year and now without the power of any Monitoring from Calderdale MBC

Yours faithfully  
XXXXX

468

Dear Community Safety,

I object to the renewed application for a permit to operate a waste incinerator at the Belmont site in Sowerby Bridge.

Incineration creates CO<sub>2</sub> and reduces recycling, which goes against the aims of the Council

In my view this wooded valley near to houses and schools is the wrong situation for a waste incinerator because it creates noise and pollution and extra traffic.

The Council should not leave this decision to planning officers but abide by the decision of the Government Planning Inspector of 5 July 2023 who concluded that he was “unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment”.

XXXXX

469

Dear Sir,

I would like to lodge an objection to the above planning application for an Incinerator in Sowerby Bridge by Calder Valley Skip Hire.

I attended a number of meetings when they applied before including the one with the Government Planning Inspector where their application was refused.

I would like to object to this most recent application for the same reasons that their application was denied before:

- Modelling of air pollution data that was flawed because the data came from an area that wasn't a steep-sided valley. Their new data is still out of context.
- The traffic congestion and pollution because of the numerous and continuous commercial lorries which would attend the site. The existing volume of traffic to the site is excessive and causes issues of congestion and dirt on the road.
- The company did not appeal the decision made by the Government Inspector, instead they have reapplied to the LA, I believe this is deliberate, in an attempt to get the application through by default. The LA is strapped for cash and can barely afford to pay for its statutory responsibilities. The LA employees do not have the expertise or the finances to be able to do a thorough investigation. In my opinion, this company is immoral and should be fined for wasting public money and time.
- Finally, this application has removed the clause enabling monitoring of the situation by the LA.

In conclusion, if this application is approved, it would be a travesty for the local population and would also smack of coercion on the part of Calder Valley Skip Hire which would warrant a legal investigation.

Yours sincerely,  
XXXXX

470

Dear Sir/Madam,

I would like to register my strong opposition to the granting of an Environmental Permit for an incinerator in Sowerby Bridge. I believe the proposed location to be totally unsuitable for an operation of this kind. As a resident of the valley, I can attest to the current high levels of pollution and with a history of respiratory problems I can also attest to the problems this causes to health. The gases and particulate matter it would produce have been proven to be detrimental to public health and I am aware the permit has been previously refused for exactly this reason. Why would anyone feel it necessary to further pollute an area that has existing unacceptable levels?

I also believe strongly that CVSH are not suitable operators of a SWIP. The poor CVSH reputation in the area is supported by their previous breaking of regulations and thus many resident complaints to the council. The fact that many of these complaints have not been properly recorded or actioned also demonstrates that Calderdale Council have neither the staff nor the facilities to monitor a SWIP safely.

Both Scotland and Wales have a moratorium on the building of these incinerators in recognition of their effects on air quality. Hopefully this will shortly be the case in England as people realise there are far safer and more effective ways to dispose of waste. It would be a demonstration of the councils' commitment to creating a cleaner, healthier environment for its residents if this permit is rejected once and for all.

I would like to request that my details, including my email address and name be kept anonymous.

Thankyou  
XXXXX

471

I have noted with some concern that CVSH have submitted another application to operate an incinerator at their site on Rochdale Road. This seems to be a repeat of the previous application which was refused in July 2023 by the Government Planning Inspector so here are my grounds for objecting:

1) Why is another application even being considered when the previous decision wasn't appealed by the applicant? And why are the council wasting their time and our money dealing with the inevitable mountain of re-objections that are about to ensue?

2) Since the grounds for refusal last time were because of the height and proximity of the smoke stack to trees and woodland the government inspector was "unable to find that waste gases would be discharged in a controlled way to safeguard human health and the environment" and since the already-built stack is actually below the level of Rochdale Road, it would be a nothing short of a miracle if those waste gases aren't going to affect directly the air breathed in and around the locality.

3) Each ton incinerated equates to one ton of carbon dioxide released into the atmosphere. Perhaps this is why both Wales and Scotland have already banned any new permits. Will the council be insisting on carbon scrubbers being installed for example. Otherwise, they are basically applying to run a massive bonfire 5 days per week. Source: <https://ukwin.org.uk/facts/>

With a request to burn 2000kg per hour, this is roughly the carbon dioxide equivalent of running 2000 5kW log-burning stoves continuously. What are the council's plans for offsetting this and capturing the wasted heat?

4) Hoping to use a computer model for what is a unique (for incinerators) valley location based on data collected from a weather station some 20 miles away in a totally different topographical area would seem to be folly, unless of course there was some advantage to be had by the applicant. Naturally, as per the recent Horizon/Fujitsu case, any future case involving discounting of the risks involved would be laid at the door of the decision makers who will almost certainly be proven to have inadequately "safeguarded human health and the environment". Whatever legal threats have been made by CVSH, a crowd-funded class action at some future date would be much costlier to the council.

5) The frequent valley inversions would effectively channel the gases directly into Sowerby Bridge town centre ensuring a toxic smog in concentrations far above any legal limits

6) I strongly object to the council handing responsibility for monitoring emissions directly to CVSH themselves, effectively



marking their own homework. This is a company with a proven track record for disregarding existing operating conditions under which they were originally given planning for their recycling business. Specifically a one-way operation with no reversing beepers was not implemented and the skip chains are not sleeved as per the original planning conditions. Nor is the bund constructed to design.

7) With a government target of 16 million tons of incinerator capacity, reducing to 11 million, and with existing over-capacity of 20 million the necessity to provide even more over-capacity is puzzling too. Since there are more jobs in recycling, this seems like an ideal way to create unemployment at the expense of local people's health.

472	<p>I am writing to object to the request for an incinerator by Calder valley skip hire.</p> <p>It's not a good idea to have noxious fumes pumping into a narrow valley like ours. I'm worried they will hang around in the air poisoning this area.</p> <p>The main street through out town is already one long trail of traffic chugging out exhaust fumes daily which often smells bad.</p> <p>The health of our population needs considering and breathing bad air would be detrimental to that. ( I have asthma as do many others)</p> <p>Wildlife especially birds will suffer.</p> <p>I believe something like this should be built higher up on the hills NOT in the midst of a residential area.</p> <p>Please refuse this request.</p> <p>Yours</p> <p>XXXXX</p>
473	<p>Hi</p> <p>I would like to place my objection to planning application S13/006 for the Sowerby bridge incinerator. I have heard it will be bad for locals people long term health XXXXX</p>

474      Regards

Resubmission of Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

I strongly object to the resubmission from Calder Valley Skip Hire who have again applied for an Environmental Permit to operate on Rochdale Road. Sowerby Bridge.

This application is a resubmission of an application dated 5th August 2020 which was refused on the 5th July 2023 by a Government Planning Inspector, John Woolcock.

There was and is still compelling evidence that granting permission will be detrimental for the population of Sowerby Bridge, Triangle, residents, nursery, school junior & nursery, social & sports clubs, and businesses as Sowerby Bridge is already suffering from pollution.

As for Triangle nursery, school, allotments & residents, the area is often engulfed by smoke & mist which can be seen even more clearly from higher up the valley

I & my husband are in our 70s, have lived here for almost 50 years along with our sons & at times foster children. In my younger days with friends I opened and ran a playgroup in the cellars at the local Methodist church. A few years later, with the help of a local mp the playgroup moved to a Porto cabin at Triangle School. The nursery is now combined within the extended school building.  
The Methodist church was bought, refurbished & is now a private nursery.

My husband is the XXXXX

He also tends his allotment on Rochdale Road. I am now disabled & limited to what I can do.

It is important for us & others to live without this worry of the incinerator coming up every few years.

I'd like to believe my sons family, grandchildren, friends, neighbours & community will be able to breath cleaner air than now & even cleaner air in the future.

Regards  
XXXXX

475	<p>I would like to object to the planning application of the incinerator in Sowerby bridge, Rayburn valley by Calder valley skip hire.</p> <p>I don't not want this company to be allowed to burn waste products in our valley on the grounds of air pollution/ reducing air quality/ creating smells and potential effecting wildlife in the. wood land. We have a right to breathe fresh air.</p> <p>XXXXX</p>
476	<p>To whom it may concern,</p> <p>I write to object to the plan for an incinerator to be built in the calder valley.</p> <p>The toxins gasses released are an obvious public health hazard, it would be irresponsible and dangerous for such a facility be granted planning permission.</p> <p>I therefore am in complete opposition to this plan.</p> <p>Regards, XXXXX</p>
477	<p>This is an objection to to the site incinerator at Belmont . How can Calderdale council allow this when you have agreed to a Clean air policy to reduce pollution.</p> <p>I suffer with Cronic asthma, poor air quality contributes to this and causes severe attacks , my granddaughter too has recently struggled with asthma and poor airflow being admitted to hospital , adding more pollution is going to make this worse . The hospitals are overflowing with cancer patients this incinerator could potentially cause more .</p> <p>I hope you rethink this application carefully and reject it not allowing for this to happen in our valley , what a mistake it would be to allow this to go through .</p> <p>Regards XXXXX</p>

478 I objection to incinerator in Sowerby bridge. I feel this will damage my local environment as well as physical health of myself and family living on XXXXX.  
Why is this even an option and why do they keep asking when our community says no.

Thank you  
Kind regards  
XXXXX

479 I completely object to the proposed incinerator. I feel this will be detrimental to the area, it will impact the health of local people, and will cause many issues that are unwanted. I do not want to see this built at all. I strongly object.

480

Dear Sir or Madam,

I have been made aware of the plans for an incinerator to be placed at the Belmont site in Sowerby Bridge. I strongly object to this.

I am also aware that there was a decision by the Government Planning Inspector in 2023 to refuse the proposal, because it could not be shown that waste gases would be discharged in a controlled way and therefore could pose a risk to human health.

Surely this is reason enough for Calderdale to refuse this new application now? Waste gases from the chimney will add to the air pollution in the area, already too high and a recorded danger to health, particularly to children, those with respiratory conditions and the elderly.

Can the council please consider the methods which have been used, by the company, to suggest the discharge will not pose a safety issue to health? When taken in context, their safety assessment was carried out using meteorological data from Yeadon, which is a completely different landform to Sowerby Bridge.

The Belmont site is in a very narrow valley in which mists regularly remain for some time, and smoke from fires ( at the waste recycling site run by the applicant ) has been recorded as remaining for some time in the valley and not dispersed. The chimney stack is surrounded by thick woodland which hinders dispersal. 18 schools and a large number of residential properties within 2 miles of the stack are above the height of the chimney and the long plume can be in any direction. There is already an oversupply of incinerators; waste should be recycled, not burnt.

I understand that Councillors and the local MPs are opposed to the Incinerator, yet the council have passed the decision on to Environmental Health Officers. I feel this is ethically wrong and public opinion in this matter should not be disregarded. The issue is extremely important to the whole population of Sowerby Bridge, the surrounding hillsides, the Calder Valley and the Ryburn valley and should be decided by elected representatives.

The decision should be to refuse permission; the community has a right to breathe clean air.

Regards,

XXXXX



481

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,  
XXXXX  
Concerned resident.

482

Ref S13/006  
Belmont Industrial Estate  
Sowerby bridge

I wish to lodge my objection to the new EP application submitted by CVSH to the Council.

In a decision dated 5 July 2023, John Woolcock, of the planning inspectorate, considered the EP put forward by CVSH at appeal. In his decision the inspector concluded -

" I have taken into account all other matters raised in the evidence but have found nothing to outweigh the main consideration that lead to my conclusions. I am unable to find that granting an EP for the SWIP would not have an unacceptable adverse effect on human health and the environment.

In accordance with Regulation 31 (6) EPR 2016 the appeal is dismissed and the refusal stands."

Nothing physical has materially changed in the new EP application e.g. stack height, trees, topography etc therefore the inspectors decision is still robust and should stand and this is the basis for my objection.

I appreciate that the Council has to consider this new application by CVSH at face value however I trust that it will reach the same conclusion as the government inspector, otherwise where will we be where an appeals process can be circumvented / undermined simply by submitting a fresh application without actually changing anything each time the applicant receives an unfavourable decision.

Please acknowledge receipt of this email.

Thank you.  
XXXXX

483 I am writing to object to the proposed use of the incinerator on Rochdale Road Sowerby Bridge.

- In July 2023 a Government Planning Inspector refused the application due to concerns about the discharge of waste gases and their risks to the health of local people and the environment.
- All elected representatives and MPs have opposed this application, reflecting strong local objections. Breathing clean air is a basic right that should be protected for our community
- Polluting gases from the chimney will not be dispersed above the level of the houses along the valley and hillsides but will be in the air breathed by all who live here. There are 9 schools within 1 mile and 18 schools within 2 miles of the chimney. The schools in close proximity are all above the proposed chimney height. A public footpath runs close to the site. Calderdale had the highest rate of respiratory tract infections in West Yorkshire for infants under one year in 2016 & asthma admissions in 2019.
- The proposal uses data from the weather station at Leeds Bradford Airport to show that the gases will be dispersed. This is nowhere near the Ryburn Valley and the landform is completely different. The steep-sided Ryburn valley and prevailing winds mean that emissions will frequently blow towards the centre of the local population. In windless conditions, local residents regularly see smoke and mist hanging for long periods in the valley.
- There are reasonable doubts as to whether CVSH would operate an incinerator correctly. Already, there have been several fires and there is also a flood risk. CVSH have shown the wrong postcode on the application for a place not at risk of flooding.
- It is concerning that the application removes the Council's ability to request site diaries and inspection records to monitor compliance.

Please refuse this application. The risks to our air quality and health are simply too high.

XXXXX

### OBJECTION

I object to the above application on the grounds that the risks to human health have not been properly considered. The proposed incinerator is planned to burn domestic waste that cannot be recycled. This is typically known as RDF (Refuse Derived Fuel). RDF is a mixture of waste that contains plastics. The percentage of plastic in the mix is variable and depends upon the actual waste received. It can be 10 – 40 % plastics but on a day-to-day basis it can be more or less than this.

During plastic incineration toxic compounds are produced including dioxins, furans, heavy metals and particulates. All these are dangerous to human health.

The proposed incinerator is positioned in an urban environment with domestic housing on all sides. Because the site of the proposed incinerator lies in the bottom of the narrow valley, much of the local housing is above the height of the stack, where the pollution emissions will exhaust into the atmosphere. At this point, the pollution is subject to dispersion by the local weather. Depending upon such factors as wind direction, local topography and relative humidity, air can be trapped in the bottom of the valley. This does happen from time to time. During the previous uncontrolled fire at the Belmont waste site, smoke was trapped in Sowerby Bridge for over 2 days.

To create toxic pollutants in an incinerator, and to rely on 'technology' to reduce these toxins in the fumes, before they are pumped out into the environment, just 12m above ground, in the middle of a densely populated urban environment, where dispersion is already compromised by the topography, is putting the health of everyone in the area at risk.

There are several reasons why the risks to human health have not been properly considered, As follows :-

1) Terrain. The local topography is such that predicting dispersion in the bottom of a narrow valley is extremely complicated and normal rules do not apply. The incinerator lies in the shadow of Norland Moor which is at 280m elevation, causing a unique set of conditions. Dispersion is further complicated by the height of trees surrounding the site.

2) Reliance on computer modelling. The applicant has used evidence from two sets of computer modelling to support the application. One model shows the temperature distribution and residence time within the combustion chamber, in order to show that a high enough temperature is reached for long enough to reduce dioxins, furans and particulates within the gas flow, to acceptable levels for the emissions. Another computer modelling program is used to simulate the dispersion of those emissions. In both cases these models only show results for a prescribed set of input conditions. They do not

represent what happens in the real world, where conditions are variable and subject to abnormal or unforeseen events.

3) Weather Statistics. Weather data has been used for the dispersion modelling. The data used has come from Leeds Bradford Airport and Bingley. Leeds Bradford Airport is 20 miles away; it is England's highest airport at an elevation of 208m and has a totally open aspect in all directions. The site of the proposed incinerator is in the very bottom of a narrow valley with trees around; and sheltered from prevailing weather conditions. The weather patterns are not comparable. This renders the dispersion modelling analysis invalid.

4) Waste sorting. The combustion modelling is based on a typical RDF (Refuse Derived Fuel) waste composition. This requires careful sorting and segregation which relies upon human intervention to obtain the correct mix. In a real-life situation the RDF will have huge variations making the combustion modelling invalid.

5) The Incinerator is not licensed to burn hazardous materials. However, it is quite possible that hazardous materials could be missed in the sorting process, leading to inadvertent incineration.

6) Lithium batteries are a known source of uncontrolled fire events in waste streams, since lithium batteries are often present in domestic plastic waste. The risk assessment has not addressed the risk of lithium batteries in the waste processing and incineration.

7) Power failure. There is a risk of uncontrolled emissions during a power cut. In this situation, the dispersion of the plume emitted from the stack will be outside the scope of the computer modelling, causing pollution to the local area.

8) Incinerator Start-up and Shut-down. These are periods when emissions can exceed permitted levels, giving pollution to receptors in the local area. Start-ups and shut downs are likely to be frequent occurrences because the incinerator can only operate Monday to Friday, due to planning restrictions. In addition, the incinerator building is too small to store the volume of RDF fuel required for continuous overnight operation with the roller shutter doors closed (another planning restriction) so frequent start-ups and shut-downs will be inevitable.

9) Human interventions. Safe operation of the incinerator plant will rely on human interventions. Highly trained and qualified staff will need to operate the plant. The training statement says that "any new operational staff are trained under the supervision of experienced operational staff". This is unacceptable, since standards of competence will be eroded over time, leading to unsafe plant operation.

10. Dioxins are produced when burning RDF. Described by the WHO (World Health Organisation) “Dioxins are highly toxic and can cause reproductive and developmental problems, damage the immune system, interfere with hormones and cause cancer”. Dioxins are classified as Persistent Organic Pollutants. When considering potential receptors, the analysis should include Sowerby Bridge Day Nursery, Victoria Road, HX6 3AE, which is close to the river Ryburn, downstream from CVSH Belmont site, in addition to several other nurseries in the area.

11. From the figures submitted, the proposed fume emissions from the stack in a 24-hour period is equivalent to the volume of 44 Olympic size swimming pools, or alternatively greater than the volume of the Albert Hall. This amount of pollution in this locality will affect the local weather patterns and further compromise the health of those living in this valley.

I rely on the good officers of Calderdale Council to ensure the safety of our valley, not just now, but for future generations.

Yours sincerely,  
XXXXX

485	<p>Sowerby Bridge is in an Air Quality Management Area because of pollution which gets stuck in the valley bottom. The re-submission of the application for an incinerator next to the town and within 2 km of 12 local schools, is a danger to public health.</p> <p>I am a Calderdale resident and visit Sowerby Bridge. I strongly object to the Incinerator proposal and to the manner in which it is being re-considered without democratic debate by elected councilors. Many people believe there may be fear of litigation or even corruption influencing the decision making process.</p> <p>The people must decide on such matters, not vested interests.</p> <p>Please take account of this opposition to the Incinerator and the strength of local feeling against it.</p> <p>Yours sincerely, XXXXX</p>
486	<p>I, XXXXX of XXXXX formally object to the latest Calder Valley Skip Hire permit application for a small waste incinerator plant.</p> <p>I object for the following reasons</p> <ol style="list-style-type: none"> <li>1 an application was turned down in 2018 on the basis of insufficient evidence to guarantee air quality for businesses &amp; surrounding residents</li> <li>2 a virtually identical permit application of 5 August 2020 was refused at appeal on 5 July 2023 3 the proposed incinerator site &amp; waste exhaust fume plume smoke stack is only 670 metres down wind from the Sowerby Bridge area which is already an Air Quality Management Area. The permit should be refused due to the historic evidence of smoke &amp; low cloud hanging in the valley bottom .</li> </ol> <p>The large amount of diesel wagons travelling to &amp; from the site would also add to the already damaging traffic congestion .</p> <p>Yours sincerely XXXXX</p>

487 To whom it may concern,

I am writing to object to the new incinerator at the Belmont site in Sowerby Bridge.

I am a permanent resident in Sowerby Bridge, a home owner, tax payer and active community member who will be directly affected by this site.

My objections are based on a the following:

1. CVSH have provided data from Leeds/Bradford airport to try prove their waste will clear naturally. However, we live nowhere near the airport, we are a unique valley and nothing like the environment near the airport.
2. The air quality will be affected; Sowerby Bridge already has high pollution levels especially as it is so close to the motorway and the regular closures causing more traffic to flow through.
3. The company and shareholders are trying to go above the higher court ruling which should not be allowed but undoubtedly will be although this move can viewed as morally corrupt.
4. The chimney stops considerably lower than the surrounding trees and hillside, not to mention Norland above.
5. The vast majority of houses and residents in the immediate areas will be directly negatively effected.
6. It is environmentally destructive, contributes nothing to the cohesive and diverse community and will financially lower house prices.

I hope you will seriously consider the above points made in opposition to this site and take action to prevent its construction.

We can but live in hope.

Yours faithfully,  
XXXXX



488 Dear Community Safety,

I strongly object to the proposed Incinerator at the Belmont site in Sowerby Bridge.

The decision by the Government Planning Inspector in 2023 to refuse the proposal, was made on the grounds that it could not be shown that waste gases would be discharged in a controlled way as to safeguard human health. What better grounds are there for Calderdale to refuse this new application now ? Waste gases from the chimney will add to the air pollution in the area, already too high and a recorded danger to health, particularly to children.

The applicants' evidence that the discharge would be safe is based on computer modelling which uses meteorological data from Yeadon, a very long way from the site, with a totally different landform. The Belmont site is in a very narrow valley in which mists regularly remain for some time, and smoke from fires ( at the waste recycling site run by the applicant ) has been recorded as remaining for some time in the valley and not dispersed. The chimney stack is surrounded by thick woodland which hinders dispersal. 18 schools and a large number of residential properties within 2 miles of the stack are above the height of the chimney and the long plume can be in any direction. There is already an oversupply of incinerators; waste should be recycled, not burnt.

I understand that the Council, though all the Councillors and the local MPs are opposed to the Incinerator, have passed the decision on to Environmental Health Officers. Surely this is not right. The issue is extremely important to the whole population of Sowerby Bridge, the surrounding hillsides, the Calder Valley and the Ryburn valley and should be decided by elected representatives.

The decision should be to refuse permission; the community has a right to breathe clean air.

XXXXX

489

I wish to object against the proposed incinerator being built in Sowerby bridge. The reasons I oppose this is for a number of reasons:

1. The increased traffic would have a detrimental impact on the surrounding area causing a massive noise increase, both day and night, in what is otherwise a peaceful surrounding neighbourhood, especially at night.
2. The incinerator is also far too close to two schools. The smoke would just rise from the chimney, up the opposite hill where there are primary schools and a secondary school. The impact on children's young lives would be massive, not only the constant unpleasant smell but also potentially causing an increase in asthma sufferers and other medical issues.
3. The valley has two steep sided hills either side of it. When there have been fires in the past, the smoke from these fires has stayed in the valley for hours, and in an incident I remember, the smoke hung in the valley for days. The smoke from the incinerator, although they are planning to have a tall chimney, this would not be sufficient for it to reach the top of the hills, in order for it to be carried away in the wind.
4. Previous research that has been carried out regarding prevailing winds have all been carried out in areas which have been flat, so are therefore very different from the unique area of Sowerby bridge, with its valley and surrounding steep hills. This means the data which they are using to promote that it is perfectly safe, is totally inaccurate.
5. The pollution caused by the incinerator would also have a detrimental impact of people choosing to live in the area causing an economic impact on the local area.

I hope the reasons I have stated above are enough for you to see sense and understand that the incinerator should NOT be built in Sowerby Bridge!

Regards  
XXXXX

490 To whom it may concern,

I wholly object to the plans for an incinerator in Sowerby bridge. The valley itself is densely populated which a high traffic volume on a daily basis due to it's locality to the nearest motorway.

The air quality that this proposed incinerator would bring is highly concerning and makes me genuinely worried for both my health and the future health of my children and all others.

I find it deeply concerning that the proposal has been rejected before and is now up for debate AGAIN.

Please take this email as my firm objection to this plan and all plans relating to it. It is everyone's duty to keep the place in which we call home, the air our children breath, clean and as toxic free as possible.

Regards

XXXXX

491 As a resident near to Calderdale Skips I'd like to put forward my objection please to the purposed incinerator application.

Thank you

Regards

XXXXX

Sent from my iPhone

492 To whom it concerns,

I am writing to object to Calder Valley Skip Hires application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

I will also be writing to Calderdale Council to request an explanation as to why the Council are incapable of doing their job to vote on this matter.

I will also be writing to the Secretary of State to request an explanation as to why the professional, expert opinion of the Government Inspector, John Woolcock, does not stand and they are able to make a repeat request for something that was rightly refused.

My objection is based upon the factors detailed below;

- John Woolcock stated that given the height and proximity of the smoke stack to trees and woodland, he was unable to find that waste gases from the incinerator would be discharged in a controlled manner as to safeguard human health and the environment – the application does not include a change to this stack height (the applicant would have to reapply for planning permission!).
- This is particularly concerning as I reside at XXXXX, very close to the incinerator. I suffer from Multiple Sclerosis and Asthma, can you guarantee that my health won't be affected by the use of the incinerator?
- Can you guarantee that there will be no noise pollution from the incinerator and I will still be able to enjoy using my garden and opening the windows of my home?
- The only difference between this license application and the previous is the ADMS computer model that has been used, unfortunately this does not use local weather data, instead it uses the data from Leeds Bradford airport where there is a weather station, a different environment that doesn't work with the circumstances that the incinerator is located. The flow of waste gases through the trees and valley cannot be accurately predicted by the computer simulation. It is the British standard on dispersion that you cannot trust the figures if the local terrain is unusual – as it is in Ryburn Valley. Further laws of dispersion are that it doesn't happen at the valley bottom.
- Sowerby Bridge is already suffering from pollution. It is in an Air Quality Management Area and is only 670 metres downwind of the incinerator. Smoke and mist regularly lie in the valley bottom and inversion can stop waste gases dispersing, this throws considerable doubt on the validity of the air quality models presented by CVSH.
- The original application says that, "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time", this has since been removed from the new application. This significantly removes the Council's ability to monitor compliance in the operation of the incinerator. We are aware that the planning permission was granted with the requirement that a wall was built between the site and the river – this has not been done. How can we trust that the applicant will use the facility as is safe to do so if they are already not abiding to the planning permission

that was granted?

- The area is also at a high risk of flooding, how does this work well with an incinerator?
- On a national level, there are enough incinerators to meet the Government Policy proposed for the amount of waste that we are able to incinerate in England, why are we allowing more to be built and used? This is counterintuitive to the Government Policy.

All local Councillors, of all political parties, and the two local MPs have opposed this application from the beginning and for good reason.

XXXXX

493 To whom it concerns,

I am writing to object to Calder Valley Skip Hires application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

I will also be writing to Calderdale Council to request an explanation as to why the Council are incapable of doing their job to vote on this matter.

I will also be writing to the Secretary of State to request an explanation as to why the professional, expert opinion of the Government Inspector, John Woolcock, does not stand and they are able to make a repeat request for something that was rightly refused.

My objection is based upon the factors detailed below;

- John Woolcock stated that given the height and proximity of the smoke stack to trees and woodland, he was unable to find that waste gases from the incinerator would be discharged in a controlled manner as to safeguard human health and the environment – the application does not include a change to this stack height (the applicant would have to reapply for planning permission!).

- Can you guarantee that there will be no noise pollution from the incinerator and I will still be able to enjoy using my garden and opening the windows of my home?

- The only difference between this license application and the previous is the ADMS computer model that has been used, unfortunately this does not use local weather data, instead it uses the data from Leeds Bradford airport where there is a weather station, a different environment that doesn't work with the circumstances that the incinerator is located. The flow of waste gases through the trees and valley cannot be accurately predicted by the computer simulation. It is the British standard on dispersion that you cannot trust the figures if the local terrain is unusual – as it is in Ryburn Valley. Further laws of dispersion are that it doesn't happen at the valley bottom.

- Sowerby Bridge is already suffering from pollution. It is in an Air Quality Management Area and is only 670 metres downwind of the incinerator. Smoke and mist regularly lie in the valley bottom and inversion can stop waste gases dispersing, this throws considerable doubt on the validity of the air quality models presented by CVSH.

- The original application says that, "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time", this has since been removed from the new application. This significantly removes the Council's ability to monitor compliance in the operation of the incinerator. We are aware that the planning permission was granted with the requirement that a wall was built between the site and the river – this has not been done. How can we trust that the applicant will use the facility as is safe to do so if they are already not abiding to the planning permission

that was granted?

- The area is also at a high risk of flooding, how does this work well with an incinerator?
- On a national level, there are enough incinerators to meet the Government Policy proposed for the amount of waste that we are able to incinerate in England, why are we allowing more to be built and used? This is counterintuitive to the Government Policy.

All local Councillors, of all political parties, and the two local MPs have opposed this application from the beginning and for good reason.

XXXXX

To whom it concerns,

I am writing to object to Calder Valley Skip Hires application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

I will also be writing to Calderdale Council to request an explanation as to why the Council are incapable of doing their job to vote on this matter.

I will also be writing to the Secretary of State to request an explanation as to why the professional, expert opinion of the Government Inspector, John Woolcock, does not stand and they are able to make a repeat request for something that was rightly refused.

My objection is based upon the factors detailed below;

- John Woolcock stated that given the height and proximity of the smoke stack to trees and woodland, he was unable to find that waste gases from the incinerator would be discharged in a controlled manner as to safeguard human health and the environment – the application does not include a change to this stack height (the applicant would have to reapply for planning permission!).

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- The area is also at a high risk of flooding, how does this work well with an incinerator?
  - On a national level, there are enough incinerators to meet the Government Policy proposed for the amount of waste that we are able to incinerate in England, why are we allowing more to be built and used? This is counterintuitive to the Government Policy.
- All local Councillors, of all political parties, and the two local MPs have opposed this application from the beginning and for good reason.

XXXXX

495

Dear Sir.

As a local resident I wish to object in the strongest possible terms once again to Calder Valley Skip Hire's application to operate a waste incinerator on Rochdale Road, Sowerby Bridge.

- Firstly, Sowerby Bridge already suffers very poor air quality, indeed it is in an air quality management area such is the current pollution levels, therefore how on earth will operating a waste incineration site ½ mile up the road (and upwind) help in this case??
- Secondly, the height and proximity of the proposed smoke stack of the plant to the nearby trees & woodland mean that waste gases from the incinerator could not be discharged in a controlled manner which would safeguard human health & the environment.
- Thirdly, on a regular basis throughout the year mist & fog & smoke lie in the valley bottom throughout the year and inversion would surely stop waste gases from the incineration plant dispersing as is often seen after any fire in the valley. Such inversions are a common phenomena in our valley, so there must be better sights for a waste plant in other areas where such inversions don't occur.
- Lastly, Calder Valley Skip Hire needs to understand that this application has to be the last and that no further applications will be allowed.

Yours Faithfully,  
XXXXX

496

Hi Community-Safety,

We are writing to object to Calder Valley Skip Hire Ltd's environmental permit application (Ref.: S13/006).

Common sense is sufficient to know that there is no worse place to operate a waste incinerator than a poorly ventilated valley bottom, close to a river, uphill from a populated area. No genuine independent environmental or air quality study is capable of proving otherwise. Yet Calder Valley Skip Hire Ltd have applied to conduct activities in such a place. It is baffling that the applications have been entertained to such a degree as requiring my objection today.

Following the application, Calder Valley Skip Hire Ltd should not be permitted to operate any related high-risk activities on this site. The continued frivolity of applications shows a complete lack of understanding of the nature of the processes concerned and a lack of respect for the local environment, people and council. Such misunderstanding and disregard draws the conclusion that Calder Valley Skip Hire Ltd lack sufficient competencies to conduct proposed activities. The relentless nature of applications continue to show an extension of incompetence to the inability to appoint competent persons to act on their behalf. Calder Valley Skip Hire Ltd therefore cannot be trusted to operate within the confines of any permit issued. Any existing Calder Valley Skip Hire Ltd activities should be reviewed and permits withdrawn

accordingly.  
Yours sincerely,  
XXXXX

497 I am writing to object to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in the future DENIED.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets. Please also think of the health and welfare of the people living in Sowerby Bridge and the surrounding areas. The measurable pollution in our valley is already high due to the congested roads (always standing queues of traffic) and because of its topography which traps pollution in the bowl of the valley.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

XXXXX

498 I object to the planned incinerator!

- the site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution
- the site is at risk from flooding
- insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict
- competence of CVSH to run

499

Dear Sir.

As a local resident I wish to object in the strongest possible terms once again to Calder Valley Skip Hire's application to operate a waste incinerator on Rochdale Road, Sowerby Bridge.

- Firstly, Sowerby Bridge already suffers very poor air quality, indeed it is in an air quality management area such is the current pollution levels, therefore how on earth will operating a waste incineration site ½ mile up the road (and upwind) help in this case??
- Secondly, the height and proximity of the proposed smoke stack of the plant to the nearby trees & woodland mean that waste gases from the incinerator could not be discharged in a controlled manner which would safeguard human health & the environment.
- Thirdly, on a regular basis throughout the year mist & fog & smoke lie in the valley bottom throughout the year and inversion would surely stop waste gases from the incineration plant dispersing as is often seen after any fire in the valley. Such inversions are a common phenomena in our valley, so there must be better sights for a waste plant in other areas where such inversions don't occur.
- Lastly, Calder Valley Skip Hire needs to understand that this application has to be the last and that no further applications will be allowed.

Yours Faithfully,

XXXXX

500

Dear Sirs,

I am writing to voice my objection to the Incinerator Application by Calder Valley Skip Hire.

As someone who has recently suffered breathing difficulties and low oxygen levels I am deeply concerned of the detrimental effect allowing this incinerator application to go ahead.

In a time of high air pollution, the council should be looking at ways to improve this rather than give their approval to make the air we breathe even more toxic.

This deep-sided, tree lined valley is completely unsuited to burning on an industrial scale, especially in such a residential area where the air quality is already poor due to the amount of traffic funnelled down the valley.

The area is prone to flooding, the sewage system is under great pressure and our rivers in the Ryburn and Calder Valleys are some of the most polluted in the UK. Additional toxic run-off from the incinerator would be disastrous to the ailing health of our waterways.

Calderdale Council need to consider the long view and the urgent need for our country as a whole to be reversing pollution rather than adding to it.

I hope our email objections are heard, global warming is a massive threat to humanity - earth will survive but our future generations may not be a part of earth's future if we don't act now.

Yours faithfully  
XXXXX

501 In my opinion the above application for Environmental Permit should not be approved for the following reasons.  
Ive been to several meetings regarding the CVSH Incinerator applications ,plus the latest two one at Norland Church & the other at Foundry St SowerbyBridge .  
All the people attending these meetings strongly oppose the passing of the Environmental Permit for the SWIP at Belmont by CVSH .  
The application doesn't seem to have changed much over time .Therefore all the refusals must stand . These include the one produced by Government Planning Inspector JOHN WOOLCOCK .  
The weather data for the Incinerator Site situated in the deep Valley of Sowerby Bridge ,enclosed by trees along side a fresh water River was not tested there ( ie not on site ).  
The Data was taken from Leeds Bradford Airport the highest in England at 208 Mts .  
The River Ryburn is 68 Mts where the application is for .Leeds Bradford Airport is set on a high Plateau , the site at Belmont is set in a deep Valley filled with a densely groath of trees and a river .THERE IS NO COMPARISON .  
I live directly above the Incinerator site ( Sowerby Croft) .The wind blows down the Ryburn Valley thus taking gasses/ emissions towards Sowerby Bridge ,then hit by the Calder Valley wind thus directing it to home above the site and into Norland .  
I suffer form COPD My Autoimmune system is weakened by medication for Rheumatoid Arthritis . I live in a windy but clean area at the moment and do not wish for my health to be made worse by this INCINERATOR .  
At other times the Valley is filled with mist / low cloud which will trap the emissions thus enveloping Sowerby Bridge .We've got rid of the Mill Chimneys we dont need more pollution.  
There's also the matter of Transporting "10,000 tons" of waste going to the site per year. Also the removal of waste and non combustible material from the site . The road network to this site is a poor "Air Quality Zone " .Plus congested without the extra emissions from this site and extra traffic in the form of 18ton Trucks .  
Therefore im totally against this Incinerator and its application for an ENVIRONMENTAL PERMIT at the Belmont Site in Sowerby Bridge by CVSH .

Regards XXXXX

502 Dear Sir/Madam, I hereby lodge my objection to the proposed incinerator by Calder Valley Skip Hire. This proposal has already been refused once and should not be granted due to the high level of pollution it would cause along the river Ruburn valley. We are already subject to toxic smoke and fume pollution coming from nearby works behind Slitheroe Bridge. We do not want our air quality degraded further by the proposed incinerator. As a sufferer of asthma, good air quality is paramount to my health. This is a residential area in a steep sided valley. It is difficult for smoke and fumes to dissipate due to the geography of our valley. The plans go against Calderdale Council's intentions to make this valley greener and safer. The studies done to assess the likely damage to our local environment state that it would be detrimental to local inhabitants and to the natural beauty of this area.

Please register my objection to this proposal.

Yours sincerely,  
XXXXXX

Sent from Outlook for Android



503

I write to voice my objections to the new application by Calder Valley Skip Hire in Sowerby Bridge for the application to Calderdale Council to grant the license for the Incinerator.

My objections are detailed below:

1. National and international agenda is on reducing carbon emissions in order to reduce global warming. Incinerators and burning rubbish to dispose of it is in direct contrast to this agenda to reduce carbon emissions. Sowerby Bridge is already suffering from pollution with smoke and mist regularly hanging in the unique geographical terrain of a steep sided, heavily wooded valley bottom with the River Calder running through the valley. Current burning in the valley bottom results in smoke hanging in the valley bottom unable to disperse due to the steep sided valley. This would become 'the norm' if the incinerator were to go ahead. There are 6 primary schools within a 3 mile radius of the school ( 1200+ pupils) aswell as a secondary school (2000+ pupils) aswell a significant volume of residential housing. Consider the future pressures on the NHS as a result of the local population breathing excess levels of carbon emissions and developing respiratory and circulatory health issues as a result of granting the incinerator license to be located in this inappropriate location .

2. Nationwide ( England) there are already sufficient numbers of incinerators to adequately cope with the volume/tonnes of rubbish that as a country we are currently incinerating. National agenda is on reducing volume/tonnes of rubbish being incinerated year on year in favour of using cleaner, less carbon emitting methods of recycling our waste. Yorkshire as a County already has adequate existing incinerators to deal with the waste generated. Scotland and Wales already have a moratorium on the ban of using incinerators for waste disposal. The nationwide agenda should be to have a permanent ban on incinerators given they are proven to be unable to discharge waste gases in controlled way as to safeguard human health and the environment.

3. The existing site, being sited near to the River Calder which has flooded several times over recent years caused waste to be washed into the river downstream polluting the river course. Given inadequate defences and protection on the existing site to prevent flood water from reaching incinerator and waste site this contamination of waste into the river would increase. The location and site for the incinerator chimney is quite plainly inappropriate on several levels.

4. The applicants evidential support and graphic simulation of the smoke dispersal from the plume not being any cause

for public health concern is flawed. Using a computer aided model based at Leeds/Bradford Airport is in no way comparable to the terrain that the current site is located in which is a steep sided wooded valley bottom. The smoke dispersal from the smoke plume, be it above or below the tree line, would cause smoke to hang in the valley bottom. The false belief that emissions into the atmosphere would be diluted and dispersed is inaccurate. Carbon gases from emissions from an incinerator are heavier than air. Sooner or later they fall to the ground, turn into Nitric Acid or Ozone Greenhouse gas. On cloudless, windless days emissions will fall to the ground near the source and with wind the emissions will still exceed safe levels and fall to the ground elsewhere but still nearby in a populated area.

5. Noise levels and excess traffic. The current site located on busy A58 Rochdale Road is an inhabited and significantly populated valley bottom and current activity from the recycling plant can already be heard by households living nearby at all hours and through the night. The proposal to operate 24 hours a day, 5 days a week processing in excess of 10,000 tons of waste per year will have massively detrimental impacts onto the schools, households and other businesses operating in the area. The already congested A58 Rochdale Road which suffers from traffic congestion will be further exacerbated with the volume of lorries carrying waste to and from the site (proposals of up to 120 lorries per day) The above points made highlight the reasons why it would be inappropriate to grant the applicants the license and would demonstrate negligence on the councils responsibility to protect the health of the inhabitants within Calderdale as well as contributing to detrimental effects on the local environment.

I hope these points will be carefully considered.

Thankyou

XXXXX

Local resident

504

I am writing in regards to the application for a permit to operate an incinerator at Calder Valley Skip Hire's Belmont site. I wish to give my objection to this application.

I am very concerned about the environmental impact this would cause to the surrounding area.

The site is not suitable for the incinerator as it is in a densely wooded, steep sided, highly populated valley, very close to an Air Quality Management Area and also close to a dozen schools.

This application is a resubmission of an application dated 5th August 2020 which was refused at appeal by a Government Planning Inspector on 5th July 2023.

England already has more incinerator capacity than it needs and Incinerators harm recycling rates. A Defra report published in August 2020 stated that: "Of total residual waste from household sources in England in 2017, an estimated 53% could be categorised as readily recyclable, 27% as potentially recyclable, 12% as potentially substitutable and 8% as difficult to either recycle or substitute". If the current waste going to incinerators has all readily recyclable waste removed it would create 50% more capacity.

The Government has a target for England to achieve 65% recycling for municipal solid waste by 2035 and no more than 10% landfill. As some residual waste is not combustible, the Government's 65% recycling target implies that the rate of incineration should be no higher than a maximum of around 30%. However, in 2019/20, 45.5% of England's local authority collected waste was incinerated.

Calderdale Council in 2019 declared a climate emergency and are wanting to hit net zero emissions by 2038. UK Without Incinerators Network 2018 Incinerators Climate Change report states "Incineration results in high levels of greenhouse gas emissions. For every tonne of waste burned, typically around one tonne of CO<sub>2</sub> is released into the atmosphere, and around half of this is fossil CO<sub>2</sub>. If an incinerator is allowed in the Calder valley I feel it would make the climate pledge of net zero by 2038 unattainable.

Calder Council also states its vision for Calderdale in 2024 and beyond is:

To be a place where you can realise your potential;  
and live a larger life, whoever you are.

Critical in achieving this vision we will need to:

Make sure that we protect Calderdale's distinctive environment;

and be resilient to the effects of climate change.

The Waste Transfer Site at Belmont already causes us as neighbours stress due to the noise coming from the yard, in lighter months noise starts early and ends late and it means we don't sit outside as much as we would like to. If they are allowed to work 24 hours this will make it unbearable.

Please refuse this resubmission of an old application that has been refused already. By doing so Calderdale will be a better place for everyone who lives, works, explores, holidays here.

Yours sincerely  
XXXXX

505 Ref S13/006 - Environmental permit application

I am writing to you to put forward my personal written objection to the latest application for an environmental permit for the operation of a small waste incinerator plant at Calder Valley Skip Hire's Belmont Site.

I am aware that this has been an ongoing local issue as Calder Valley Skip Hire, over the years have put forward multiple attempts at gaining permission for this and on multiple occasions they have been told no, including in July of last year by government inspectors. The government inspector said that due to the height and proximity of the smoke stack to trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment".

Breathing clean air is our right, poor air quality affects health outcomes, it is of great concern to myself and members of my family that Calder Valley Skip Hire running an incinerator in the valley bottom will have significant negative affects upon the respiratory health of those people living close by. Both the Calder Valley and Halifax constituencies have already got a higher than the national average percentage of population living with asthma (Halifax 7.5% and The Calder Valley 7.6% where the national average is shown as 6.5%) and COPD (Halifax 2.25% and The Calder Valley 2.23% where the national average is showing as 1.85%) (Data taken from the House of commons library constituency data dashboard). It is my concern that these health conditions would be worsened by an incinerator running and this will have a knock-on effect on our local health systems in the future.

I believe there to be limited available data of how air pollutants would be taken from the close locality and fear that they would remain due to the very specific geography of the area. Calder Valley Skip Hire's Belmont site is in a narrow valley bottom, prone to inversions and cold air pooling which would I believe in turn mean that any pollutants would remain in the close locality rather than dissipated into the wider area. I do not believe that the Met office has appropriate available data to satisfactorily dissipate any fears of this. Sowerby Bridge is already suffering from air pollution. It is in an Air Quality

Management Area and is only 670 metres downwind of the incinerator. Living across the road from the Belmont site, we are within a smokeless area. A number of years ago, but in my personal (very clear) memory of the time, there was a fire at the Belmont site and the smoke from this hung heavily throughout Sowerby Bridge, as far as where we lived at the time which was in the Tuel Lane area.

I have concerns about any additional noise that we would experience as close neighbours, especially at night and early in the mornings from the site if they were running an incinerator 24 hours a day. It is already the case that we are woken from onsite noise early in the morning in the summer months and cannot comfortably sit out in our garden during their operating hours due to noise.

I have concerns about a potential negative effect upon local tourism and in turn the local economy, especially if there is potential for the site to have increased odours as I feel that people holidaying would not choose to do so close by to a

working incinerator.

In addition to all of the above concerns I am aware that Calderdale Council is wanting to increase recycling levels, I feel that an incinerator goes against this ethos.

Yours sincerely,

XXXXX

506

Hello,

I am a resident of Sowerby Bridge and I want to make a strong objection to the proposed incinerator for various reasons

- the site is liable to flooding
- the site is unsuited to burning due to trees
- it is a residential area
- insufficient modelling of area which is prone to temperature inversion and complex wind patterns
- will put off tourists and visitors

I know many residents have already objected many many times over the years, please listen and stop this once and for all!

XXXXX

Sent from my iPhone

507

Hi

I'm writing to add my name to the many concerned with the application for the Sowerby Bridge Incinerator.

The plan is wholly unsuitable for the location and will add to the already high pollution, being in a deep sided, tree lined, residential valley.

Additionally the experience and competency of a skip hire company to run such a complex venture must be questionable.

The sooner this damaging plan is rejected the better

Rgds

XXXXX

Sent from Outlook for iOS



508

Dear sirs

We wish to object to the resubmission of an application for an Environmental Permit by Calder Valley Skip Hire to operate a waste Incinerator on Rochdale Road Sowerby Bridge

My understanding is that the original application was thrown out by the government Inspector on the grounds that he was:

" unable to find that the necessary measures have been taken to ensure that waste management would be carried out without endangering human health, without harming the environment and in particular without risk to air in compliance with Article 13 of the Waste Framework Directive 2008/98/EC."

It seems clear that little has changed, the proposal has the severe potential to negatively affect the Air Quality of the surrounding area which is already-according to my understanding-very poor , affecting residents and their children (there are 3 schools and also nurseries within half - three quarters of a mile).

The area is subject to high levels of pollution from traffic congestion enhanced by the geographical aspects of a narrow-wooded valley, waste gasses from the proposed plant coupled with heightened heavy wagon movements will clearly exacerbate this situation .

I also wonder how Environmental Health Officers - given the severe reduction in funding following the Austerity measures imposed by Central Government will find the time to accurately monitor that the full conditions of the Environmental Permit will actually be met and be able to deal with the heightened correspondence from protesters under the Freedom of Information Act, requesting evidence that such measures are being enacted.

In short, the proposal would be an environmental disaster for the area. My understanding is that this is an officer decision, while following due process I would hope that they decide to wholeheartedly reject.

Yours

XXXXX

509

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing

Yours  
XXXXX

510

Dear Sir or Madam

I am writing to register my objection to the latest application by Calder Valley Skip Hire to install and operate an incinerator at their site in Sowerby Bridge. There is no significant change to the previous application which was rejected by a Government Planning Inspector last year.

The site is wholly inappropriate for incineration as it is in a sheltered wooded valley. The proposed stack is too short to lift the plume out of the valley and smoke, gases and particles from the incinerator would not be suitably dispersed but would land close to the site on surrounding houses, schools and businesses. The reliance on data from Leeds Bradford Airport is flawed as the two locations are wholly different in terms of aspect and terrain.

Yours faithfully

XXXXX

Dear Sir/Madam,

RE: OBJECTION TO CVSH WASTE INCINERATION PLANNING APPLICATION Ref: S13/006.

I object in the strongest terms to ANY incineration being carried out in Sowerby Bridge and Ryburn valley.

I object for the following reasons:

- The site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution.
- The site is at risk from flooding.
- Insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict.
- Competence of CVSH to run an incinerator.
- pollution in the area.
- Cause environmental damage.
- Have a detrimental impact on the health of local residents.
- Produce smells and dangerous fumes.
- Increase the amount of traffic.
- Increase the risk of another fire.
- Generate smoke and dangerous smog which will hang in the valley.
- Cause noise.
- Reduce the air quality in the area.
- Adversely effect the local wildlife and nature.
- Have a detrimental effect to the Green Belt which this site is situated in.
- Reduce amenity for local residents.
- Adversely affect tourism and visitors to the area.

•• Further to the above points, i am particularly concerned as I have an asthmatic condition and am sensitive to specific impurities in the air. I also suffer from Anosmia (Lack of sense of smell) so I am unable to discern if there are any impurities in the air and therefore cannot prepare in advance should seen or unseen pollutants are present that would affect my breathing and overall health of me and my Family.

I trust you will appreciate the level of opposition from the beginning from all political parties and the two local MPs, Ward Councillors and from the local community and reject this application.

Yours faithfully,

XXXXX

512 XXXXX

Dear Sir/Madam,

RE: OBJECTION TO CVSH WASTE INCINERATION PLANNING APPLICATION Ref: S13/006.

I object in the strongest terms to ANY incineration being carried out in Sowerby Bridge and Ryburn valley.

I object for the following reasons:

- The site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution.
- The site is at risk from flooding.
- Insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict.
- Competence of CVSH to run an incinerator.
- pollution in the area.
- Cause environmental damage.
- Have a detrimental impact on the health of local residents.
- Produce smells and dangerous fumes.
- Increase the amount of traffic.
- Increase the risk of another fire.
- Generate smoke and dangerous smog which will hang in the valley.
- Cause noise.
- Reduce the air quality in the area.
- Adversely effect the local wildlife and nature.
- Have a detrimental effect to the Green Belt which this site is situated in.
- Reduce amenity for local residents.
- Adversely affect tourism and visitors to the area.

•• Further to the above points, i am particularly concerned as my husband has an asthmatic condition and is sensitive to specific impurities in the air. He also suffers from Anosmia (Lack of sense of smell) so he is unable to discern if there are

any impurities in the air and therefore cannot prepare in advance should there be seen or unseen pollutants present that would affect his breathing not to mention his and my overall health and that of our Family.

I trust you will appreciate the level of opposition from the beginning from all political parties and the two local MPs, Ward Councillors and from the local community and reject this application.

Yours faithfully,

XXXXX

Sent from Yahoo Mail for iPhone

513	<p>I wish to object to the SWIP at the Belmont Site in Sowerby Bridge.</p> <p>A government inspection has already suggested this is a bad idea! The measurable pollution in our valley is already high due to the congested roads (always standing queues of traffic) and because of its topography which traps pollution in the bowl of the valley.</p> <p>It can not be allowed to go ahead.</p> <p>XXXXX</p>
514	<p>To whom it may concern</p> <p>As a local resident of Sowerby Bridge, I wish to object to the application for the Calder Valley Incinerator.</p> <p>I do not think that we should be adding further pollution to our air and waterways. Residents and our local wildlife should be able to breathe clean air and not run the risk of breathing in potentially hazardous chemicals, therefore I object to this application.</p> <p>XXXXX</p>
515	<p>Dear Community safety officers,</p> <p>Please note myself and my family's objection to the proposed incinerator in the valley of Sowerby Bridge. At the time of the last application (that was rejected) government investigators were not able to verify that the waste gases could be discharged in a safe and controlled way . This is a red flag for the residents of this area . Why would we take a chance on something that may significantly damage local people's health ? It is well known that airborne particles and pollution can lead to diseases such as asthma and cancer . There are enough pollutants about locally without adding more . The valley is a deep one and often has inversions of air / cloud which can further complicate the evaporation of toxic gas . The canal through the valley is popular with narrow boats / tourism / walkers . Adding a polluting incinerator will make the valley less attractive to visitors and residents alike</p> <p>There are general objections to burning waste because of the increased CO2 into the atmosphere therefore promoting climate change . As a council that is aiming for zero carbon this is not at all the kind of activity the local authority should be allowing . Waste that could be recycled will also be burnt which should not be the way we are dealing with waste. We expect your stringent attention to these serious issues .</p>



Yours sincerely ,  
XXXXX

516 Dear Sir/Madam,

I wish to register my "strongest possible objection" to the application to operate an incinerator by Calder Valley Skip Hire at the Belmont site in Sowerby Bridge. Nothing has changed since the environmental permit was denied previously.

I live in the immediate vicinity of the proposed incinerator with my partner and the findings of the inspector obviously still apply.

Myself and my partner have been fighting cancer over the last 15 years. I personally am on my 3rd bout of lung cancer and now also have throat cancer and we both have severe breathing issues and find the valley already has extremely poor air quality. How can this application be considered again when it has been refused on numerous occasions?

There are also numerous neighbours in close proximity to where we live that are also suffering from severe breathing difficulties and also various forms of cancers. In fact, over the last 5 years several neighbours have passed away and there is no doubt that the air quality has not helped their quality of life when alive!

This valley is not suitable for an incinerator as it is in a deep sided and tree lined residential valley that already suffers high pollution levels.

It's about time that a final NO was given to this proposal for an incinerator and that more thought was given to the lives and health of all the people who live here.

Also, the area attracts a lot of tourists which helps to keep the local shops etc open. If CVSH get permission to build this unhealthy incinerator this not only has a terrible impact on the health of all the residents within this valley and the surrounding areas, we will find that tourists will also stop visiting the area and contributing to the local economy.

Please, please say NO to this application as we already have more than enough pollution in our beautiful valley which already contributes to lots of terrible health conditions of our residents.

Kind regards

XXXXX

517 Hello

I wish to register my objection to the application for a permit to operate a waste incinerator in Sowerby Bridge.

As an asthma sufferer and resident of the upper valley in Calderdale, I am very concerned about the impact on air quality and public health.

I hope the council will follow the advice of the planning inspector who disallowed the previous planning application, on finding that waste gases would not be discharged in a controlled way.

As the council would not be able to safeguard the environment or human health, this should not be permitted.

Regards

XXXXX

518 I would like to submit my objection to the granting of an Environmental Permit to Calder Valley Skip Hire Ltd. for an incinerator in Sowerby Bridge – application S13/006.

My reasons are as follows:

#### Decision Process

On 5th July 2023 the Planning Inspector John Woolcock ruled that the Environmental Permit for the Calder Valley Skip Hire (CVSH) incinerator was refused at appeal. This judgment by a senior government inspector is now being disregarded and CVSH have been allowed to resubmit their application. The whole process has been allowed to continue for 8 years at great expense to the public and considerable time commitment from the council. A decision was made, and valid and still applicable reasons were given.

The applicant had the opportunity to request a Judicial Review but chose not to. They have now purchased a further set of statistics and an untested model based upon measurements taken at the considerably different locations of Leeds/Bradford Airport and Bingley. The model produced is not relevant to the unique topography at the Belmont site in Sowerby Bridge. In an Email response earlier this week, Sally Ellis at the Met Office has confirmed that a Senior Data Scientist at the Met has said 'It is not possible to model the weather conditions at HX6 3LL because it is a narrow, deep valley ..... we could not meaningfully assess conditions in that valley. Meteorological convention would suggest that the valley would be prone to inversions/cold air pooling.' Therefore, the CVSH model submitted is not fit for purpose and cannot be given credence.

The council has spent public money on legal assistance in the form of John Barrett who showed a complete lack of impartiality. The council breached its own consultation procedures with the previous application and has now placed a decision as important as this in the hands of individuals who are inexperienced in issues relating to SWIP operation. This does not inspire public confidence in the process.

#### Location

The SWIP would be operating in a narrow, steep sided valley over 200 metres high. There are frequent temperature inversions that would cause incinerator plume gases to be trapped at lower levels and then carried by prevailing wind direction into Sowerby Bridge. The stack height is below road level and the canopy of trees present will prevent the plume from dispersing. This large tree canopy was a primary cause of concern for XXXXX when he refused this permit in 2023 and the trees and general topography have not changed since then.

Sowerby Bridge already has air and water pollution levels higher than government acceptable limits. Adding harmful particulate mass and gases to this already polluted location will only increase risks to public health.

Levels of noise from the CVSH site are currently problematic for local residents, 24-hour operation for 5 days a week

would serve to add to this noise nuisance and the steep valley sides cause additional amplification.

The proposed location is, in addition, situated in a high flood risk area and is alongside the river Ryburn. The regular surface flooding would cause toxins on site to be washed into the river and to seep into other water courses.

#### Inability to Enforce Permit Conditions

In 2018 the CVSH application to operate an incinerator at Mearclough in Sowerby Bridge was refused on the grounds of concern about enforceability in a situation where operations on site are governed by 2 separate permits, the SWIP permit and the Environment Agency permit. There was sufficient uncertainty about the ability of the council to enforce the permit conditions, resulting in the rejection of the proposal. This situation has not changed and therefore this Environmental Permit should be refused on the same grounds.

#### Impact on Air Quality

Sowerby Bridge is in an Air Quality Management Area with unacceptable air pollution levels and insufficient monitoring and control of these. I believe current monitoring is not fit for purpose and was not designed to measure the type of heavy metal pollutants created by a SWIP. The incinerator would lead to an increase in NOx and particulate matter in an area that currently has higher than national average respiratory disease rate amongst the residents. These gases and particulate matter are proportionately more harmful to the young. Day nurseries, primary schools and senior schools would be in the path of these dangerous substances. When Calderdale Council refused the Mearclough Permit it agreed that there are 'no safe levels of Nox and the SWIP would impact on the AQMA'. This statement applies equally to the Belmont site. I believe Bureau Veritas have been called in, at further public expense, to examine the application. I only hope that they do not use the CVSH measurements for testing the model. Weather measurements taken in another town and at a higher elevation cannot produce any type of reliable forecasting.

On March 27th the Calderdale Climate Change Action Group met at the Town Hall to discuss how air quality in Calderdale could be improved and CO2 emissions reduced considering the climate emergency. Granting a permit for a SWIP in Sowerby Bridge would completely run counter to these efforts. The proposed incinerator would burn 2 tons of waste per hour. That equates to 1 ton of CO2 per hour. That means 5,000 tons per annum. For this reason alone, the permit should not be granted.

#### Operator Competence

Having studied the previous rejection of an Environmental Permit at Mearclough, I'm aware that in order to grant a permit, there must be capability on the part of the applicant to operate the SWIP in accordance with safe procedures. Experience has demonstrated this cannot be expected in the case of CVSH. Numerous complaints about the running of the Belmont site have been made to Calderdale Council (though not always correctly recorded). Previous issues have included a fire at the premises resulting in smoke settling in the valley bottom for 3 days. There have also been waste matter pile ups, traffic problems from the large skip vehicles and noise nuisance for residents. One of these issues

required intervention by the Environment Agency because public health was jeopardised. These demonstrate that Calderdale Council as regulator has neither the resources nor expertise to monitor this SWIP with the required vigour and CVSH has repeatedly fallen short in its safe practices.

An additional concern around operator competence is the waste sorting process. The model put forward by CVSH is based on a typical Refuse Derived Fuel waste composition. In reality the waste mix will vary greatly rendering the model unreliable and inadequate.

There is no confidence at all amongst residents that CVSH will operate a SWIP in accordance with required standards. It is of great concern that when CVSH re-submitted their application, they removed a section that allowed the regulator to 'request copies of the site diary and inspection records relating to SWIP operations at any time' (previous application section 5.5.4). Also, the information supplied on the original application was of a dubious nature (inaccurate postcode relating to flood risk area and incorrect stack height details) These concerns are in addition to threatening behaviour towards objectors. These practices inspire no confidence in the applicant's ability to operate within required regulations. This is not a suitable operator for a SWIP where breaches of regulations could cause catastrophic damage to Sowerby Bridge and its residents.

#### Democratic Process

The residents of Sowerby Bridge have lived with this incinerator threat for 8 years and have not wavered in their strong opposition to its operation. The local MP's of both major political parties and all 6 local councillors have made their opposition known as have more than 2,000 residents, the local medical practice in Sowerby Bridge and conservationist and T.V wildlife presenter Chris Packham.

The only supporters of this proposed incinerator are the CVSH individuals who stand to make personal profit if it is allowed to proceed.

To conclude, the most pressing factors for refusing this permit are CVSH's unsuitability to operate a SWIP according to regulations, the council's inability to monitor and regulate an operation requiring intense scrutiny and the fact that its existence would be detrimental to the health and wellbeing of local residents. To quote John Woolcock 'I am unable to find that granting an Environmental Permit for the SWIP would not have an unacceptable adverse effect on human health and the environment.' Nothing has happened or been submitted that changes this judgement and I ask that this permit is refused again. Granting this permit would be giving a license to pollute and harm.

XXXXX

519      Objection to application for the above 24hour incinerator at Sowerby Bridge

Dear Calderdale

Please may I register my objection to the resubmission of the permit application for an incinerator by the Calderdale Valley Skip Hire company. I have carefully looked at the concerns raised by objectors and also those raised by XXXXX and have come to the conclusion that for the health of our young grandchildren I must strongly object. Further evidence to support my objection below.

Reply from Sally Ellis Met Office

'Apologise for the delay here but I have been speaking this through with a senior data scientist and he has said the below:

Unfortunately that is exactly the kind of application we cannot support. That is a very narrow, deep valley (~500m wide) that simply will not be resolved by our analyses or NWP (2km). We could not meaningfully assess conditions within that valley. Meteorological convention would suggest that valley would be prone to inversions/cold air pooling.'

Yours sincerely  
XXXXX

520 Please find my reasons for objections below:-

- 1) The site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution.
- 2) The site is at risk from flooding.
- 3) Insufficient site-specific modelling where temperature inversions are common and wind direction in the valley is complex to predict.
- 4) Competence of CVSH to run an incinerator.

Also please consider the Sowerby Bridge master plan: <https://www.yourvoice.westyorks-ca.gov.uk/sbmasterplan> and specifically its main aims are listed below:

The masterplan aims to help develop a Sowerby Bridge that is:

- Healthy - walkable and bikeable, with clean fresh air to breathe.
- Attractive - a desirable place to live, work and visit, with distinctive character.
- Sustainable - protecting and improving our spaces, with the future in mind.

I believe this would impact on tourism to the area and why would anyone want to visit a place where there is an incinerator polluting the valley.

kind regards

XXXXX

Sent from my iPhone.



521 Dear Sir/Madam

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,

XXXXX

522 To whom it may concern,

I am writing to you to present my personal written objection to the latest application for an environmental permit for the operation of a small waste incinerator plant at Calder Valley Skip Hire Belmont Site- Ref S13/006.

I am aware that this has been an ongoing local issue as Calder Valley Skip Hire have put forward multiple attempts to gain permission for this over the years. These attempts have been met with multiple refusals, including one in July 2023 by government inspectors. In this case, the government inspector stated that due to the height and proximity of the smoke stack to trees and woodland, they were "unable to find that waste gasses from the incinerator would be discharged in a controlled way as to safeguard human health and the environment."

Breathing clean air is a human right. Poor air quality affects health outcomes, something of great concern to myself and many people living in the local area. Both the Calder Valley and Halifax constituencies have a higher percentage of the population living with asthma than the national average, Halifax with 7.5% and the Calder Valley with 7.6%. The national average is 6.5% (Data taken from the House of Commons library constituency data dashboard). Many are concerned that health conditions such as this will be worsened by an incinerator running nearby, having a knock on effect on local health systems in the future.

On a personal level, the health anxieties and environmental anxieties which naturally come with such an impactful local change are bound to impact my day-to-day life. As someone who lives just across the road from the Calder Valley Skip Hire site, and suffers from Generalised Anxiety Disorder, this change weighs heavy on my mind, adding to the already prominent concerns about the future. I'm not the only one who feels like this, many people in the local area, whether or not they have a mental health condition such as mine, feel dread at the impact this change may have, not only on themselves, but also on future generations who wish to enjoy the gorgeous local area.

Yours sincerely,  
XXXXX

523	<p data-bbox="324 193 667 231">to whom it may concern</p> <p data-bbox="324 263 2051 343">I wish to strongly object to the resubmission of an application for an environmental permit by Calder Valley Skip Hire, to run a waste incinerator in Sowerby Bridge.</p> <p data-bbox="324 375 2051 566">I do not understand after having the original application rejected by the government inspector on the grounds that they were  "Unable to find that the necessary measures have been taken to ensure that waste management would be carried out without endangering human health, without harming the environment and 8n particular without risk to air in compliance with Article 13 of the Waste Framework Directive 2008/98/EC."</p> <p data-bbox="324 598 2051 678">The air quality in the valley is already poor due to pollution from traffic, made worse by being in the valley, often worse when the motorway is shut.</p> <p data-bbox="324 710 2051 758">My son and grandson both have asthma which is greatly affected by pollution and live in Kebroyd very near the site.</p> <p data-bbox="324 790 2051 901">As councillor you have a duty to ensure the well being of local residents is prioritised. This situation has being going on for 4 years and has caused a lot of stress and worry for many, who had assumed the issue had been resolved by the governments decision.</p> <p data-bbox="324 933 2051 1013">Any decision to allow this application to through would surly be an environmental disaster, and I plead with you rejected it and put a total stop on any further applications.</p> <p data-bbox="324 1045 448 1117">Regards XXXXX</p>
524	<p data-bbox="324 1117 2051 1268">Object to the proposed incinerator that is going to be built in Sowerby bridge. It will be burning 24 hours a day Mon to Fri. This is a re-application from Calderdale skips and a bad idea! The measurable pollution in our valley is already high due to congested roads (always standing queues of traffic) and because of its topography which traps pollution in the bowl of the valley.</p> <p data-bbox="324 1300 448 1337">XXXXX</p>

525 To whom it may concern.

I wish to object to the above application for CVSH incinerator.

Having already been previously refused, why is this even being allowed to be heard again!

Sowerby Bridge already suffers from pollution, we have the right to breathe clean air! This thing will be running 24/7, pumping all sorts into the air, we are in a valley, where do they think thats all gonna go! I live on the hillside behind this establishment and we all have asthma, I want my son to be able to play in his garden without fear of him breathing in fumes and lord knows what else! Not to mention the extra traffic and lorries this will cause. The road is already congested as it is, i am regularly held up on this road by wagons in and out when i am taking my son to school at triangle, this is only going to get worse!

How can waste gases from the incinerator be safely discharged in a tree line valley that already suffers from inversion from smoke and mist, its common sense that they cant!

I find it absolutely ridiculous that this is even being allowed to be heard again, therefore please take this as my OBJECTION.

XXXXX

526 I wish to lodge my objection to the new EP application submitted by CVSH to the Council.

In a decision dated 5 July 2023, John Woolcock, of the planning inspectorate, considered the EP put forward by CVSH at appeal. In his decision the inspector concluded -

I feel that i have taken into consideration many of the matters raised in the proposal presented but have found nothing to outweigh the main ideals that lead to my due conclusions. I simply cannot find that granting an EP for the SWIP would not have an unacceptable adverse effect on human health and the environment. Not to mention the impact upon familys and locals of the surrounding area.

I am referencing in accordance with Regulation 31 (6) EPR 2016 the appeal is dismissed and the refusal stands

Kind regards

XXXXX

527 I am writing to object strongly to Calder Valley Skip Hire's repeatedly returned proposal for an incinerator. My reasons are as follows.

1. The location, with regard to risk to human health.

The application states...

The site is located off Rochdale Road (A58), with the River Ryburn, woodland and Rochdale Road (A58) to the north. To the east of the site is Spring Bank Industrial Estate, containing a number of small light industrial properties, to the south/south-east is a dismantled railway and embankment beyond which lie residential properties at Hullen Edge Farm, Long Lane and Goose West Lane, and to the west lies the River Ryburn, woodland and small-scale industrial units along Mill House Lane.

This conveniently omits to mention the many houses that lie to the north, north-east and north-west of the site, including houses directly opposite the site, on the other side of the main road and higher up the steep hillside, also a primary school less than half a mile away as the crow flies.

The fact that the actual stack is lower than these houses (owing to the site being at the very bottom of a steep valley) makes a nonsense of any argument that the stack is high enough to allow adequate dispersal.

The application states

'The height of the chimney has been designed to provide effective dispersion of pollutants generated by the combustion of the RDF. The results of the stack height assessment indicated that a height of 12 metres would provide effective dispersion of emissions from the exhaust stack.'

And the HHHRA in addition refers to 'stack height of 12 m (metres) above ground level'

But the stack is NOT 12 metres above ground level, it is pretty much at the level of the road that runs alongside, and below the level of the houses that rise up the hill across the road.

I wonder if these many good and clever people who have submitted reports have actually visited the site and looked at the obvious facts in front of their eyes?

The HHHRA also states 'A summary of the key results from the ADMS dispersion model is presented in Table 2.3. These have been predicted using the 2015 Leeds Bradford Airport meteorological data set.'

However, the incinerator is not being operated at Leeds Bradford Airport, so this is completely meaningless, and cannot by any sort of logic be used as evidence that the incinerator is safe to run in its current location.

I have been sent a statement from the Met Office about the location of the site as follows...

'That is a very narrow, deep valley (~500m wide) that simply will not be resolved by our analyses or NWP (2km). We could not meaningfully assess conditions within that valley. Meteorological convention would suggest that valley would be prone to inversions/cold air pooling.'

This confirms what every local person knows and has seen with their own eyes. Inversions in the narrow valley affect the dispersal of pollutants and add to the air quality issues from excessive traffic through the valley. The risk of adding a low-lying incinerator to this is excessive, unwanted and un-needed, particularly in a residential area with schools, nurseries and care homes.

The fact that even the Met Office feel unable to assess or model the weather conditions in the valley highlight the meaninglessness of using data from the flat ground of Leeds Bradford Airport.

I have read the HHRA report with interest and considerable scepticism. The data is, of course inherently flawed from the start (because of the meaningless dispersion modelling). Clearly, we have no appropriate model for the dispersal, therefore no way to model the level of toxins. Had the consultants actually visited the area, or where they simply assuming dispersal of the emissions over flat land?

The report identifies a large number of toxins that the SWIP would emit, and the routes by which they enter the human body. How can it be that we are seriously considering installing equipment that would put all of those toxins into human bodies, including breast milk, and say that it's fine because of some supposedly 'safe' limits that vary wildly from one organisation to another (which basically implies that we don't know what the safe limit is - in any case 'safe' generally means that a balance has been struck between risk and convenience, and in this case we have to ask whose risk, and whose convenience?)

The amount that we know about the effects of toxins on the human body, and the effects of air pollution is changing rapidly all the time, and this study is now over two years old. It would seem sensible to commission a fresh and independent study - or even better, just to follow the precautionary principle and turn the project down.

The study also looks only at the level of contamination from the SWIP itself, and does not mention the cumulative effect of contamination from the high levels of road traffic in the area.

Given that the HHRA assumes that contamination of meat, milk, vegetables and eggs from the area is a given, what is the impact on farmers who are selling produce for consumption? Why are farmers assumed to be the only people to consume local produce? Obviously their produce is for sale, and may well be largely bought by local people, adding to their burden of toxins, as well as potentially damaging the livelihoods of the farmers.

The HHRA was in any case, commissioned and paid for by CVSH, and so is hardly impartial - would consultants get much custom if they came back with unfavourable reports ?

Finally, the aspect that seems to be forgotten is that we have the choice whether or not to burn toxic materials in a residential area. Why would we want to place human health at even a low risk, if we don't have to?

## 2. Can CVSH be trusted to keep to the conditions in this application?

The document goes into commendable detail about all the health and safety procedures that will take place, with regard to cleaning of the filter system, removal and testing of possibly toxic ash, flood gates that will prevent contaminants entering the river etc etc.

This implies that there are considerable risks to health, wellbeing and the environment should those procedures not be followed.

Unfortunately, the local community has no reason to suppose that Calder Valley Skip Hire is an operator that can be trusted to carry out these procedures responsibly.

There have been hundreds of complaints about the existing site, a fire in 2017, and council officials were called out after piles of waste accumulated in 2015.

How will compliance be monitored? How will we know that the filters are being cleaned, the flood gates are working, the ash is being tested, the workers are being correctly trained and supervised, only the correct materials are being burned, etc etc? The short answer is that we won't, because the council hasn't got the money to be checking up on CVSH day and night.

The HRHA states

The air quality assessment assumes the theoretical position that the maximum permissible emission limit values (ELVs), stipulated for legal compliance for the SWIP, are emitted during all times of operation. This position is considered unlikely to be a realistic operating scenario because, in reality, the emissions will be lower.

What grounds do we have for such a blithe assumption that the SWIP will not exceed the legal limits at any point?

How will the council be able to afford to effectively monitor this? And why should tax payers money pay for this enforcement and monitoring, while CVSH are making a profit at the expense of local residents? If the SWIP is not running, no monitoring will be needed.

### 3. The impact on nature and the environment.

The application states

There will be no emissions to surface water, groundwater or sewer from the SWIP. JER1902 | Calder Valley Skip Hire | 1 | 2 | 26 January 2024 rpsgroup.com Page 21 3.12.2 In the event of a fire, contaminated fire water from firefighting would be contained on the site by the use of flood gates which will be deployed across all entrances of the SWIP building to contain all contaminated water from firefighting within the plant building. In addition, the adjacent WTS has polybooms available which could be deployed in addition to the flood gates should this be required and following advice from the FRS.

The risk of flooding is described in the EMS addendum as 'fairly probable' ( I would consider it pretty much certain, given its location - flooding is likely to occur either from rising river levels or from water running down the steep hillsides into the site, or both, especially with climate change likely to increase flood events.)



The risk of pollution to the Calder is described as 'unlikely' but the site doesn't lie on the river Calder, it lies on the Ryburn, which is not mentioned at all.

The risk reduction relies on everything being done properly, all of the time. Even in the best-run workplace, we all know that things are not done properly, all of the time. And as stated above, the local community has reason not to trust CVSH to keep to best practice.

What is the risk to wildlife if flooding released large amounts of toxins from the site into the river? This is not mentioned anywhere that I have been able to find in the report or appendices.

The EMS addendum states ' The site will monitor weather forecasts/flood warnings so they are aware of a potential flood event and allow preventive action to be taken. Floodgates will be in place across access doorways to the SWIP building in the even of a flood.' This is yet another system relying on humans being perfect all of the time, and in real life this is just not what happens. How can anyone contemplate using a site with such a huge flood risk to be used for storing toxic materials?

#### 4. Carbon Emissions and Climate Breakdown

The application states ' It is recognised that there are both environmental and financial benefits associated with the reduction and minimisation of energy usage. Even small percentage savings in energy consumption can represent considerable financial savings and environmental benefits through emission reductions.'

We are in a climate emergency. How can a plant set up to burn wood, plastic and all sorts of other materials dare to reference 'environmental benefits' ? Burning is a process that in its very nature produces carbon emissions. How can a new incinerator be compatible with Calderdale's net zero commitments?

UKWIN states 'Meeting England's current residual waste targets would reduce potential feedstock for incinerators to around 16.4 million tonnes in 2027, falling to around 11.7 million by 2042. With 19 million tonnes of incineration capacity currently operational or under construction across England, incineration capacity can be expected to exceed available feedstock by 2.6 million tonnes in 2027, with incineration overcapacity in England growing to 7.4 million tonnes by 2042,

even if no additional incinerators are built. Further expansion of incineration in England would increase overcapacity at local, regional and national levels, harming current and future efforts to reduce, reuse and recycle.  
(<https://ukwin.org.uk/overcapacity/>)

My final reason for opposing the SWIP is one of local democracy. The people of Sowerby Bridge do not want this incinerator. They have been fighting it now for years and years. Local councillors don't want it. MPs of Calder Valley and Halifax don't want it. And it doesn't benefit anyone other than CVSH themselves. That should in itself be enough to warrant refusal.

I hope this can be laid to rest for once and all so that the people of Sowerby Bridge can get on with their lives.

With hope for common sense and justice,

XXXXX

528 I, XXXXX of XXXXX, formally object to the latest Calder Valley Skip Hire Permit Application for a Small Waste Incinerator Plant (SWIP) in Sowerby Bridge ref. S13/006.

I object for the following reasons:

1a. I live with my husband, both aged 78, on the hillside diagonally above the Shell patrol station next to Calder Valley Skip Hire. The very high winds mainly come diagonally across the valley from the Soyland hillside over Calder Valley Skip hire and hit the hillside where we live at Norland. They can be so strong that before our house alterations it blew the water out of the inside toilet!

Norland is a sought after residential area where properties are at a premium and everyone enjoys the beautiful walks and appreciates the clean fresh air we breathe. We do not want any possibility of air pollution in this beautiful area, which are few and far between.

1b. An original SWIP Permit application (APP/EPR/603) was turned down in 2018 on the basis of insufficient evidence to guarantee air quality for residents and surrounding businesses, in that it could not be guaranteed that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.

2. A virtually identical Permit application of August 5th 2020 SWIP was refused at appeal on the 5th July 2023 by Government Planning Inspector XXXXX. The Government Planning Inspector refused a permit stating he was “unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”

3. The virtually identical Permit application of August 5th 2020 SWIP (refused at appeal) totally relied 100% on an ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools.

4. The current new application ref. S13/006 of Feb 20th 2024 relies totally 100% on the same ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools.

5. The current new application ref. S13/006 of Feb 20th 2024 has the same height and size of waste gas exhaust discharge stack and appears to be a resubmission of the application dated Aug 5th 2020 but with added information stated as an 'independent review' by RPS on behalf of CVSH. The independent review was done by CERC (Cambridge Environmental Research Consultants) to verify the treatment of trees within the air quality assessment by RPS.

The review should not be taken into consideration and the permit application should be refused as it does not contain an "independent" review. CERC are the producers of the ADMS air modelling software that RPS used for this application. CERC have a vested interest in not showing up problems with their software or upsetting their customers (CVSH).

The CERC report should be disregarded as unreliable in that it stated that 'the approach adopted within the air dispersion modelling is considered appropriate and there are no other suitable models/software available'; when this is not the case and other suitable models/software are available.

6. The ADMS computer model data put forward in the permit application is not fit for purpose in that it has seriously not taken into account the effect of the specific weather condition of inversion in a valley bottom; it has only taken into account the condition of inversion with regard to weather data programmed for the flow and dispersion of waste gases from a hill top exhaust stack as located at Yeadon Airport.

Inversion being deviation from the normal change of an atmospheric property in comparing the flow and dispersion of waste gases from a low valley bottom in close proximity trees and buildings, with the high altitude of an open hill top site as per weather data used for the permit application submitted.

As the application for the Permit relies 100% on the computer model, the permit application should once again be refused as being incorrectly assumptive and as such inaccurate in not taking into account the site being located in a

valley bottom with a history of detrimental inversion.

As such the ADMS computer model data as submitted is unsafe in its attempt to guarantee safeguarding of human health and the environment.

7. The proposed Incinerator site and waste exhaust fume plume smoke stack is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2) and is identified as subject to a Council and local Environmental Health initiative to improve the air quality.

The permit should be refused given the historic evidence of smoke and low cloud hanging in the valley bottom due to the unique terrain which is the exact opposite of the computer model figures from Yeadon Airport, the waste exhaust fumes from the proposed smoke stack would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

8. As the proposed Incinerator site is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2), the additional travel to and from the site through Sowerby Bridge of extra diesel fuelled waggons transporting 2 tonnes per hour (Monday to Friday for 52 weeks per year) and then re-transporting away the non-combustible waste to landfill; would in the first instance further add to the already damaging traffic congestion and in the second instance damage even further the air quality of Management Area, (AQMA2)

The permit should be refused as the extra traffic throughput, poisonous exhaust fumes and congestion would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

9. With regard to monitoring; the August 2020 CVSH permit application states “CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time.”

The January 2024 application by CVSH should be refused as CVSH have removed the statement “CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time.”

The Permit should also be refused as there would be a restriction if not an impossibility for CMBC to continuously monitor emissions to air in order to confirm that levels are within IED emission limits, given the removal of the power of CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time.

As such the permit application does not fulfil its obligation in guaranteeing that necessary measures will be taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

10. The new application report dated 26 Jan 2024 submitted by RPS on behalf of CVSH states that the refusal at appeal decision by Government Inspector John Woolcock is “perverse” and “procedurally unfair” but yet did not take up their option to take it to Judicial Review.

The permit application should be refused as it appears both perverse and procedurally unfair of CVSH in submitting what

they state is basically the same application as in 1.5.5 in the new application report.

The permit application should furthermore be refused as it appears to be abuse of process by CVSH in not taking their option to take the original appeal decision to Judicial Review, but alternatively submitting what CVSH state is basically the same application on 20th Feb 2024 as was refused some 7months later on 5th July 2023 by Government Inspector XXXXX.

### Summary

A. A previous permit virtually the same as the Feb 2024 application which included provisions for CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time, was turned down in 2018 on the basis of insufficient evidence to guarantee air quality for residents and surrounding businesses, in that it could not be guaranteed that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.

B. A previous permit virtually the same as the Feb 2024 application which included provisions for CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time, was refused at appeal by an independent government officer on the 5th July 2023 by Government Planning Inspector XXXXX who stated he was “unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”

The latest application dated Feb 2024 is essentially the same application as the one turned down in 2018 and virtually the same as the one refused at appeal on 5th July 2023 but with s CVSH have removed the statement “CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time.”

### Conclusions

Firstly the latest permit application should be rejected as it still categorically fails to guarantee that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.

Secondly the latest permit application should be rejected as it still categorically fails to guarantee that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”

Thirdly the latest permit application should be rejected as it would essentially allow CVSH to pump waste exhaust gases at the rate of burning two tonnes per hour into the environment 670 m from nearby Air Quality Management Area 2 Monday to Friday for 52 weeks per year and now without the power of any Monitoring from Calderdale MBC

Yours faithfully  
XXXXX

529

I, XXXXX, of XXXXX, formally object to the latest Calder Valley Skip Hire Permit Application for a Small Waste Incinerator Plant (SWIP) in Sowerby Bridge ref. S13/006.

My reasons for objecting are:-

1. Our house is sited very close on the hillside just above the application site. Any garden waste burning or anything affecting the air quality can be clearly seen drifting down the valley towards our property, as this is the prevailing winds direction.
  2. This Incinerator if ever passed would be in the valley bottom, with its emissions dispersing onto the numerous houses on the north west hillside and on into the Norland Township.
  3. In years gone by Norland was renowned for its Air Quality indeed a Children's Holiday Home was built there. Air Quality No More! if this application is allowed.
  4. I have objected on numerous occasions and indeed multi applications and appeals have been turned down. How many more do we have to endure before its finally decided  
This site is not the place to have an INCINERATOR.
  5. If this application is passed please let it be noted, I shall be applying for a Council Tax Reduction on the grounds of Bad Air Quality.
- Yours Sincerely,

XXXXX

530

XXXXX

Dear sir/madam

I am writing to object against the new application for the incinerator in Sowerby Bridge. There is already too much pollution in Sowerby Bridge.

Regards

XXXXX

Sent from Outlook for iOS



531 We object to the Calder Valley Skip Hire waste Incinerator.

Reason for objection-

Flow of waste gasses, pollution, noise and disruption

Thanks

XXXXX

532 Dear Sir

I wish to register my continued objection to this application.

Having survived cancer twice I have no wish to be subject to poor air quality. From my house in Norland it is obvious how slowly early morning mist clears in Sowerby bridge. If contaminated by pollution this would have an adverse effect on all residents.

The plan was refused by an expert for many reasons and should be again.

I am horrified local councillors will not vote on this matter! They were elected to maintain quality of life for the residents they represent and are trusted to make difficult decisions.

XXXXX

Sent from my iPhone

533 Calderdale Councillors.

I would like to strongly protest the application for a permit to run an incinerator in Sowerby Bridge. The arguments for this are well rehearsed and include the valid point that waste gasses will build up in the steep-sided valley and reduce air quality.

I am a GP working in the Calder Valley and from a health perspective we know well the short term effects of poor air quality on respiratory conditions like asthma in children, and are only beginning to understand the long term effects including poor general and respiratory health, poor mental health, and increased morbidity and mortality.

I would implore anybody involved in the decision making regarding these incinerators to vote no on permits for them. In a time when the pursuit of money has ruined so many things in this country, don't allow the health of your constituents to be another casualty.

Sincerely,

XXXXX

534 I , XXXXX of XXXXX,would like to lodge that I am against the application of an incinerator being allowed at CVSH - we live in a natural wildlife corridor and I am concerned for the wildlife and environment.

535

Hello,

I object to Calder Valley Skip Hire's recent environmental permit application, Reference: S13/006, Address: XXXXX. Last July, the Planning Inspector John Woolcock concluded he was "unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment". His reasons, as you will know, were that because of the smoke stack's height and its closeness to trees and woodland, he was "unable to find that waste gases from the incinerator would be discharged in a controlled way so as to safeguard human health and the environment."

The computer simulation models used by the applicant are unreliable.

Sally Ellis at the Met Office has replied as follows to a query from a local resident, about whether there is any actual historical data for XXXXX Incinerator site, and if not, whether it would rely on data from the nearest weather station:

Apologise for the delay here but I have been speaking this through with a senior data scientist and he has said the below:

'Unfortunately that is exactly the kind of application we cannot support. That is a very narrow, deep valley (~500m wide) that simply will not be resolved by our analyses or NWP (2km). We could not meaningfully assess conditions within that valley. Meteorological convention would suggest that valley would be prone to inversions/cold air pooling.'

Calder Valley Skip Hire's original (rejected) application says that "Calderdale may request copies of the inspection records at any time" but this has been taken out of the "new" application. This significantly removes the Council's ability to monitor compliance in the operation of the incinerator.

As Calderdale Council is now refusing to vote on the matter and has asked Council Officers to decide in the place of elected Councillors, please uphold the informed decision of the Planning Inspector last July because this incinerator would not be safe for people or the environment for reasons fully considered at the Appeal, and endorsed by information from the Met Office.

Regards,  
XXXXX

Dear Sir/Madam,

RE: OBJECTION TO CVSH WASTE INCINERATION PLANNING APPLICATION Ref: S13/006.

I object in the strongest terms to ANY incineration being carried out in Sowerby Bridge and Ryburn valley.

I object for the following reasons:

- The site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution.
- The site is at risk from flooding.
- Insufficient site-specific modelling where temperature inversions are common and wind direction in the valley is complex to predict.
- Competence of CVSH to run an incinerator is questionable.
  
- pollution in the area.
- Cause environmental damage.
- Have a detrimental impact on the health of local residents.
- Produce smells and dangerous fumes.
- Increase the amount of traffic.
- Increase the risk of another fire.
- Generate smoke and dangerous smog which will hang in the valley.
- Cause noise.
- Reduce the air quality in the area.
- Adversely effect the local wildlife and nature.
- Have a detrimental effect to the Green Belt which this site is situated in.
- Reduce amenity for local residents.
- Adversely affect tourism and visitors to the area.
  
- Further to the above points, i am particularly concerned as my Brother who lives within the affected area with his

Family has an asthmatic condition and is sensitive to specific impurities in the air. He also suffers from Anosmia (Lack of sense of smell) which I also suffer from which means we are unable to discern if there are any impurities in the air and therefore cannot prepare in advance should seen or unseen pollutants be present in the air he and I breath, and which would affect his breathing and the overall health of him and his Family and his extended Family including myself when visiting which is quite frequently.

I trust you will appreciate the level of opposition from the beginning from all political parties and the two local MPs, Ward Councillors and from the local community and reject this application.

Yours faithfully,

XXXXXX

537 My name is XXXXXX - I live on XXXXXX in XXXXXX and I wish to object to the plans to build an incinerator in Sowerby Bridge.

538

What with the Calder Valley Skip Hire/James Chambers -inspired incinerator application, here are my own grounds for objecting if anyone's at all interested. You may decide for yourself if you or those you employ wish to provide those businesses with your custom...

I have noted with some concern that CVSH have submitted another application to operate an incinerator at their site on Rochdale Road. This seems to be a repeat of the previous application which was refused in July 2023 by the Government Planning Inspector so here are my grounds for objecting:

1) Why is another application even being considered when the previous decision wasn't appealed by the applicant? And why are the council wasting their time and our money dealing with the inevitable mountain of re-objections that are about to ensue?

2) Since the grounds for refusal last time were because of the height and proximity of the smoke stack to trees and woodland the government inspector was "unable to find that waste gases would be discharged in a controlled way to safeguard human health and the environment" and since the already-built stack is actually below the level of Rochdale Road, it would be a nothing short of a miracle if those waste gases aren't going to affect directly the air breathed in and around the locality.

3) Each ton incinerated equates to one ton of carbon dioxide released into the atmosphere. Perhaps this is why both Wales and Scotland have already banned any new permits. Will the council be insisting on carbon scrubbers being installed for example. Otherwise, they are basically applying to run a massive bonfire 5 days per week. Source:

<https://ukwin.org.uk/facts/>

With a request to burn 2000kg per hour, this is roughly the carbon dioxide equivalent of running 2000 5kW log-burning stoves continuously. What are the council's plans for offsetting this and capturing the wasted heat?

4) Hoping to use a computer model for what is a unique (for incinerators) valley location based on data collected from a weather station some 20 miles away in a totally different topographical area would seem to be folly, unless of course there was some advantage to be had by the applicant. Naturally, as per the recent Horizon/Fujitsu case, any future case involving discounting of the risks involved would be laid at the door of the decision makers who will almost certainly be proven to have inadequately "safeguarded human health and the environment". Whatever legal threats have been made by CVSH, a crowd-funded class action at some future date would be much costlier to the council.

5) The frequent valley inversions would effectively channel the gases directly into Sowerby Bridge town centre ensuring

a toxic smog in concentrations far above any legal limits

6) I strongly object to the council handing responsibility for monitoring emissions directly to CVSH themselves, effectively marking their own homework. This is a company with a proven track record for disregarding existing operating conditions under which they were originally given planning for their recycling business.

Specifically, a one-way operation with no reversing beepers was not implemented and the skip chains are not sleeved as per the original planning conditions. Nor is the bund constructed to design.

7) With a government target of 16 million tons of incinerator capacity, reducing to 11 million, and with existing over-capacity of 20 million the necessity to provide even more over-capacity is puzzling too. Since there are more jobs in recycling, this seems like an ideal way to create unemployment at the expense of local people's health.

Kind regards

XXXXX

539 I would like to object to the Sowerby Bridge incinerator. I am a local resident.

When they first installed the incinerator and tested it, the valley bottom filled with smoke.

It's also in a beauty spot with a footpath running past it. This will ruin this.

The site has evolved from a small depot surrounded by woodland into a large waste disposal premises.

It's in the wrong location. I have children growing up here and don't want an additional 10,000 tonnes of waste being pumped into their environment each year. They have a right to clean air.

Many thanks,

XXXXX

Sent from my iPhone



540 Dear Sir / Madam

I am writing to ask that permission is refused for the siting of a proposed waste incinerator on Rochdale Rd Sowerby Bridge.

Sowerby Bridge already suffers from pollution and the suggested position of this incinerator would contribute to this. Waste gases would not be blown away but linger in the valley where residents would have no option but to breathe in the polluted air.

The ADMS computer model does not use local weather data and cannot accurately predict that fumes will not linger in the valley. Mist and fire smoke can be seen staying, so why should this discharge be guaranteed to be different?

This is not what a council should agree to.

Yours Sincerely

XXXXX  
Sowerby Bridge resident

541 Hi

I would like to register my objection again the application from Calder valley skip hire for an incinerator. I believe that this is an assault on Calderdale's clean air. I am asthmatic and deeply concerned that emissions from this would be harmful to mine and all our residents health. Plus catastrophic for our environment. Please invest in more recycling and reusing initiatives.

My objections also include:

- the site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution
- the site is at risk from flooding
- insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict
- competence of CVSH to run an incinerator

Thanks

XXXXX

542

Dear Sir/Madam,

I write to register my objection to the application by Calder Valley Skip Hire for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

In July 2023 a Government Planning Inspector refused the application due to concerns about the discharge of waste gases and their risks to the health of local people and the environment.

All elected representatives of the people have opposed this application which reflects strong local objections who consider breathing clean air is a basic right that should be protected and reinforced by public officers.

It is apparent that polluting gases should not be dispersed above the level of houses along the steep sided valley and in winter cold air will trap pollutants and affect all people in the valley. There are 18 schools within a 2 mile radius of the proposed chimney. These schools are above the height of the chimney and will suffer the polluting effects. Calderdale already has the highest rate of respiratory tract infections in West Yorkshire for infants in 2016 and asthma admissions in 2019. The community does not need additional pollution.

Ryburn Valley Skip Hire cannot be trusted to operate the incinerator in accordance with government regulation as their application is flawed. Their proposal data used a weather station at a windswept Leeds Bradford airport to show that gases will be dispersed. Nothing like the proposed site with nothing like the weather conditions and geography of the airport and so cannot be relied upon. They have had problems with their current operation with several fires having broken out. Also being in the valley bottom there is risk of flooding. CVSH is aware of this risk and so applied using a postcode that is not registered as a flood risk area. Bearing this in mind, it is no wonder that in the latest application that the council's ability to request site diaries and inspection records to monitor compliance with regulations, has been removed.

Please refuse this application as the risk to community health is too high.

Regards,  
XXXXX,

543

Dear Calderdale Council.

After reading the document posted on Facebook recently, of the proposed insinerater installation at Sowerby Bridge, I am writing to you to strongly oppose these plans, with regard to the implications to health and safety of people and our environment. Kind regards.

XXXXX

544 To whoever is dealing with the incinerator application at Belmont.

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or indeed anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW. As I understand it was denied a few years ago so why is it being looked at again. Nothing has changed.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review. Why is this not the case??

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing. I have heard.... and perhaps gossip only..... of people being bullied and intimidated by this company and its owners. Don't you as a council fall victim too.  
**DO THE RIGHT THING AND STOP THIS NONSENSE.**

Yours,

XXXXX

Sent from AOL on Android

545 I strongly object to our town having this waste incinerator. It has been rejected before thankfully and nothing has changed to satisfy our angst, the safety aspects cannot be guaranteed - as demonstrated before so why go through this again?. We and our children do not want to be subjected to an incinerator in our valley in a built up area operating 24 hours a day from Mon to Fri burning 10,000 tons of waste a year. We are already fighting a dangerous level of traffic pollution along the valley onto wharfe street and up our hillsides There is a large population here with numerous junior schools and two very large high schools,, where is the sense and responsibility in allowing this to go ahead in such an area? it beggars belief that this has reared its toxic head again , it's such a danger to our health and thin, unscientific, unbelievable promises from Calder Valley skip hire are not to be believed. Who is going to monitor and inspect the site? any breaches of regulations will just be met with fines, this is a very wealthy company, a fine will mean nothing to them, meanwhile damage is done to our environment and our children.  
Please do the right thing as before and say no to this incinerator.

Yours Faithfully  
XXXXX

546 Hi,  
I am writing to object to the application for an environmental permit for a waste incineration plant in Sowerby bridge (ref: S13/006).  
This is a terrible idea that shows no consideration for the future of our planet or the people that live in the surrounding areas.  
The site is unsuited for burning as it is in the middle of dense woodland, and in an area already suffering from high levels of pollution.  
The toxic fumes would also make their way to nearby schools and sport fields, such as the cricket club in triangle where children frequently play.  
Furthermore, I doubt the competence of CVSH to run an incinerator responsibly.

Yours sincerely  
XXXXX

Sent from my iPhone

547 I am emailing to object to the incinerator that is being proposed in Sowerby Bridge.

The health impact on local residents would be significant. This is a highly populated area and the site location is not suitable.

Please do not let this go ahead.

Regards

XXXXX  
Sent from my iPhone

548

Good Morning,

Calderdale Planning S13/006

I am writing to strongly object to Calder Valley skip Hire's proposed Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

The location of the proposed incinerator is not suitable. As stated by John Woolcock (a government planning inspector), on his inspection of the site, given the height and proximity of the smoke stack to trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment."

In addition to the above I am concerned about the impact the proposed incinerator would have to local residents. This is for the following reasons:-

As is widely known incinerators emit particles. The Committee on the Medical Effects of Air Pollutants (COMEAP) has published a series of statements and reports on the effects of air pollutants on health in the UK. It is accepted that exposure to current levels of common air pollutants damages health. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland seeks to reduce concentrations of air pollutants. Where concentrations of air pollutants are raised, Air Quality Management Areas are defined and plans to reduce concentrations are developed by Local Authorities.

Sowerby Bridge is already in an Air Quality Management Area and this is 670 metres from the proposed incinerator. In addition to greenhouse gas emissions that exacerbate climate change, incinerators emit many toxins and pollutants that harm local air quality. Emissions include dioxins, NOx and ultrafine particulate matter that can be harmful to both human health and the natural environment. Incinerators emit large quantities of CO<sub>2</sub>, roughly one tonne of CO<sub>2</sub> for every tonne incinerated. About half of this CO<sub>2</sub> derives from fossil sources such as plastic. For decades incinerators have been releasing harmful greenhouse gas (GHG) emissions without compensating society for the associated harm that this has caused.

Both long-term exposure and short-term increases in exposure to particles can damage health. This is widely accepted (World Health Organization, 2006). Long term exposure affects the risk of mortality, especially from cardiovascular



disease and from lung cancer (COMEAP, 2009, COMEAP, 2006; Health Effects Institute, 2000). Short-term increases in concentrations cause cardio- respiratory effects including an increase in deaths from heart attacks and from respiratory disease, increased hospital admissions for treatment of these disorders and increases in related symptoms. No thresholds of effect can be identified for either the effects of long-term exposure or for the effects of short-term increases in concentrations. Thus, any increase in particle concentrations should be assumed to be associated with some effect on health.

One of the most worrying aspects within the application submitted is Calder Valley Skip Hire have removed the council's ability to monitor compliance in the operation of the incinerator.

As residents of Sowerby bridge we believe that breathing clean air should be a basic right of any community. I am deeply disappointed that Calder Valley Skip Hire continue to submit applications despite numerous application being rejected. Sent from my iPhone  
Sent from my iPhone

549 To whom it may concern,

I am writing to express my strong objection to the proposed incinerator project in Sowerby Bridge, particularly in light of recent findings from the government inspector regarding its potential impact on air quality and public health. I am deeply concerned about the detrimental effects this incinerator could have on the community's well-being and environment.

The fact that Sowerby Bridge is already designated as an air quality management area underscores the urgency and importance of addressing any potential sources of pollution. The proposed incinerator raises significant alarm bells, especially considering the remarks made by the government inspector regarding the inability to ensure that waste gases would be discharged in a controlled manner to safeguard human health and the environment.

The statement from the government inspector, indicating an inability to guarantee the safe discharge of waste gases, is deeply troubling. It suggests a serious risk to the health and safety of residents, particularly vulnerable groups such as children, the elderly, and individuals with pre-existing health conditions. This is incredibly concerning to me, as I am sure it is to many other families in our community.

Moreover, the potential negative impacts of the incinerator extend beyond immediate health concerns. Air pollution can have far-reaching consequences, including environmental degradation, ecosystem disruption, and exacerbation of climate change. Given the pressing need to address these issues, approving a project with such uncertain and potentially harmful implications would be irresponsible and short-sighted.

I urge you to consider the long-term well-being of Sowerby Bridge residents and the environment by rejecting the proposed incinerator project. Instead, I implore decision-makers to explore alternative waste management solutions that prioritise public health, environmental sustainability, and community resilience.

Thank you for taking the time to consider my objections. I hope that you will give careful consideration to the concerns raised by myself and other residents regarding the proposed incinerator.

Sincerely,

XXXXX

550

Good Evening

Calderdale Planning S13/006

I am writing to strongly object to Calder Valley skip Hire's proposed Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

The location of the proposed incinerator is not suitable. As stated by John Woolcock (a government planning inspector), on his inspection of the site, given the height and proximity of the smoke stack to trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment."

In addition to the above I am concerned about the impact the proposed incinerator would have to local residents. This is for the following reasons:-

As is widely known incinerators emit particles. The Committee on the Medical Effects of Air Pollutants (COMEAP) has published a series of statements and reports on the effects of air pollutants on health in the UK. It is accepted that exposure to current levels of common air pollutants damages health. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland seeks to reduce concentrations of air pollutants. Where concentrations of air pollutants are raised, Air Quality Management Areas are defined and plans to reduce concentrations are developed by Local Authorities.

Sowerby Bridge is already in an Air Quality Management Area and this is 670 metres from the proposed incinerator. In addition to greenhouse gas emissions that exacerbate climate change, incinerators emit many toxins and pollutants that harm local air quality. Emissions include dioxins, NOx and ultrafine particulate matter that can be harmful to both human health and the natural environment. Incinerators emit large quantities of CO2, roughly one tonne of CO2 for every tonne incinerated. About half of this CO2 derives from fossil sources such as plastic. For decades incinerators have been releasing harmful greenhouse gas (GHG) emissions without compensating society for the associated harm that this has caused.

Both long-term exposure and short-term increases in exposure to particles can damage health. This is widely accepted (World Health Organization, 2006). Long term exposure affects the risk of mortality, especially from cardiovascular disease and from lung cancer (COMEAP, 2009, COMEAP, 2006; Health Effects Institute, 2000). Short-term increases in concentrations cause cardio- respiratory effects including an increase in deaths from heart attacks and from respiratory disease, increased hospital admissions for treatment of these disorders and increases in related symptoms. No thresholds of effect can be identified for either the effects of long-term exposure or for the effects of short-term increases in concentrations. Thus, any increase in particle concentrations should be assumed to be associated with some effect on health.

One of the most worrying aspects within the application submitted is Calder Valley Skip Hire have removed the council's

ability to monitor compliance in the operation of the incinerator.

As residents of Sowerby bridge we believe that breathing clean air should be a basic right of any community. I am deeply disappointed that Calder Valley Skip Hire continue to submit applications despite numerous application being rejected.

Regards

XXXXX

551 Hi - I'm writing to oppose the application by Calder Valley Skip Hire for an environmental permit to operate a small waste incineration plant at the Belmont Site in Sowerby Bridge.

I have lived in this area for almost 60 years and the Ryburn valley is a very special place which would be spoiled for current and future generations by the approval of this permit.

More specifically the site itself is unsuitable for burning as it is in a deep sided, tree lined, residential valley which already suffers high pollution; the site is at risk from flooding; there is insufficient site specific modelling where temperature inversions are common and wind direction in the valley is difficult to predict; and last, but by no means least, there are concerns about the competence of CVSH to run an incinerator.

I hope that the the significant number of objections from the local community are taken into account and the permit is not awarded

Yours sincerely

XXXXX

Sent from my iPad

552 Good evening,

This is a brief email to let you know that

I strongly object and oppose the request for a permit to build an incinerator in, or near, Sowerby Bridge. I object on the grounds of health and safety concerns with regards the waste fumes not being able to be guaranteed clean and scrubbed of all negative and harmful chemicals to human, wildlife, insect and plant life.

Best regards,

XXXXX

I am writing to strongly object to Calder Valley Skip Hire's proposed Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

The location of the proposed incinerator is not suitable. As stated by John Woolcock (a government planning inspector), on his inspection of the site, given the height and proximity of the smokestack to trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment."

In addition to the above I am concerned about the impact the proposed incinerator would have to local residents. This is for the following reasons:-

As is widely known, incinerators emit particles. The Committee on the Medical Effects of Air Pollutants (COMEAP) has published a series of statements and reports on the effects of air pollutants on health in the UK. It is accepted that exposure to current levels of common air pollutants damages health. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland seeks to reduce concentrations of air pollutants. Where concentrations of air pollutants are raised, Air Quality Management Areas are defined and plans to reduce concentrations are developed by Local Authorities.

Sowerby Bridge is already in an Air Quality Management Area and this is 670 metres from the proposed incinerator. In addition to greenhouse gas emissions that exacerbate climate change, incinerators emit many toxins and pollutants that harm local air quality. Emissions include dioxins, NOx and ultrafine particulate matter that can be harmful to both human health and the natural environment. Incinerators emit large quantities of CO<sub>2</sub>, roughly one tonne of CO<sub>2</sub> for every tonne incinerated. About half of this CO<sub>2</sub> derives from fossil sources such as plastic. For decades incinerators have been releasing harmful greenhouse gas (GHG) emissions without compensating society for the associated harm that this has caused.

Both long-term exposure and short-term increases in exposure to particles can damage health. This is widely accepted (World Health Organization, 2006). Long term exposure affects the risk of mortality, especially from cardiovascular disease and from lung cancer (COMEAP, 2009, COMEAP, 2006; Health Effects Institute, 2000). Short-term increases in concentrations cause cardio- respiratory effects including an increase in deaths from heart attacks and from respiratory

disease, increased hospital admissions for treatment of these disorders and increases in related symptoms. No thresholds of effect can be identified for either the effects of long-term exposure or for the effects of short-term increases in concentrations. Thus, any increase in particle concentrations should be assumed to be associated with some effect on health.

One of the most worrying aspects within the application submitted is that Calder Valley Skip Hire have removed the council's ability to monitor compliance in the operation of the incinerator.

As residents of Sowerby bridge we believe that breathing clean air should be a basic right of any community. I am deeply disappointed that Calder Valley Skip Hire continues to submit applications despite numerous applications being rejected.

554

Calderdale Planning S13/006

I am writing to strongly object to Calder Valley skip Hire's proposed Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

The location of the proposed incinerator is not suitable. As stated by John Woolcock (a government planning inspector), on his inspection of the site, given the height and proximity of the smoke stack to trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment."

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One of the most worrying aspects within the application submitted is Calder Valley Skip Hire have removed the council's ability to monitor compliance in the operation of the incinerator.



As residents of Sowerby Bridge we believe that breathing clean air should be a basic right of any community. I am deeply disappointed that Calder Valley Skip Hire continue to submit applications despite numerous application being rejected.

I live nearby and also work in a primary school very close to this, and we have had to deny the children outdoor breaktime and keep classroom windows closed when smoke has come down the valley before from this place. I find it astonishing that children's health and wellbeing would be put in jeopardy if the proposed plans were to go ahead.

Regards,  
XXXXX

Yahoo Mail: Search, organise, conquer

555

Hello,

I would like to put forward my frustration about the plans for the incinerator.

The pollution to the local area would make it an unsafe place to live from the toxic gases made by it, house prices would fall dramatically and also the long term affects of the people and the roads through Sowerby bridge. Which are shocking anyways nevermind another 20 artics going through a day. Also the waste is already making its way into the water system it would be a tragedy for the wildlife in water and land and would completely damage the local wildlife.

This is now the second this has tried to be put forward and I would hope it is the last.

Kind regards

XXXXX

Sent from my iPhone

556

I am writing to strongly object to the application Ref S13/006 for the operation of a Waste Incinerator Plant at Calder Valley Skip Hire's Belmont site; and wish to object to this latest application in the strongest possible terms.

I am extremely concerned about the environmental impact the incinerator would have at this location and call on the council to refuse the application.

In particular, I wish to draw to your attention the following points:

1) The site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution, being within 2km of a dozen schools.

Recreational areas, homes and businesses are all within the immediate vicinity.

2) As lung disease in Calderdale is notably higher than the rest of West Yorkshire, and around 4.5% of all adult mortality in Calderdale is estimated to be due to the long term exposure to harmful particulate air pollution. The borough ranks amongst some of the worst local authorities in the country for premature death rates due to respiratory disease.

3) Further, Dioxins are produced when burning Refuse Derived Fuel and are described by the World Health Organisation as "highly toxic and can cause reproductive and developmental problems, damage the immune system, interfere with hormones and can cause cancer". Dioxins are classified as Persistent Organic Pollutants and any analysis of potential receptors should include local businesses such as the Sowerby Bridge Day Nursery which is just down-stream from Calder Valley Skip Hire.

Calderdale Council has a duty to work to reduce air pollution, it therefore should not grant an application that may well worsen the problem.

I urge all those involved in making this decision to reject this application by Calder Valley Skip Hire.

XXXXX

557

Object to the Incinerator why would you put an incinerator in the bottom of a valley ? No where for the toxins to disperse ??

Object !

558

Good Morning,  
Calderdale Planning S13/006

I am writing to strongly object to Calder Valley skip Hire's proposed Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

The location of the proposed incinerator is not suitable. As stated by John Woolcock (a government planning inspector), on his inspection of the site, given the height and proximity of the smoke stack to trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment."

In addition to the above I am concerned about the impact the proposed incinerator would have to local residents. This is for the following reasons:-

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Sowerby Bridge is already in an Air Quality Management Area and this is 670 metres from the proposed incinerator. In addition to greenhouse gas emissions that exacerbate climate change, incinerators emit many toxins and pollutants that harm local air quality. Emissions include dioxins, NOx and ultrafine particulate matter that can be harmful to both human health and the natural environment. Incinerators emit large quantities of CO2, roughly one tonne of CO2 for every tonne incinerated. About half of this CO2 derives from fossil sources such as plastic. For decades incinerators have been releasing harmful greenhouse gas (GHG) emissions without compensating society for the associated harm that this has caused.

Both long-term exposure and short-term increases in exposure to particles can damage health. This is widely accepted (World Health Organization, 2006). Long term exposure affects the risk of mortality, especially from cardiovascular disease and from lung cancer (COMEAP, 2009, COMEAP, 2006; Health Effects Institute, 2000). Short-term increases in concentrations cause cardio- respiratory effects including an increase in deaths from heart attacks and from respiratory disease, increased hospital admissions for treatment of these disorders and increases in related symptoms. No thresholds of effect can be identified for either the effects of long-term exposure or for the effects of short-term increases in concentrations. Thus, any increase in particle concentrations should be assumed to be associated with some effect on health.

One of the most worrying aspects within the application submitted is Calder Valley Skip Hire have removed the council's

ability to monitor compliance in the operation of the incinerator.

As residents of Sowerby bridge we believe that breathing clean air should be a basic right of any community. I am deeply disappointed that Calder Valley Skip Hire continue to submit applications despite numerous application being rejected.

559

Hi

I would like to raise my objections to the plans for the Incinerator in Calderdale. I think that the position of this in the valley will not allow for the smoke to clear away from the people in Sowerby bridge.

We do not have the best air pollution anyway and we don't deserve for this to be in our town. the last environmental report did not support it as it was felt it would have an impact on the health of the people of Calderdale.

Please do not allow this to be built in our small hard working town.

Sowerby Bridge Resident

560 I'm writing to object to the application for a waste incineration plant made by Calder Valley Skip Hire.

There is already far too much heavy traffic going through Sowerby Bridge and operation of the incinerator will only add to the level of air pollution. They propose to run the plant constantly. Last time they ran it we had a plume of smog high up in the Calder Valley. The site is unsuited to burning in the centre of a residential area which already suffers with a high level of pollution. People live in very close proximity to the site and there are numerous schools in the vicinity. It should not be allowed to operate like this in the centre of a residential valley. Clean air is our basic right and allowing the application will deny this right.

Please refuse this application. The risks to our air quality and health are simply too high.

Don't allow this.

Regards

XXXXX

561A To whom it may concern

I am writing yet again to make my formal objection to the CVSH planning application to operate a waste incinerator in Sowerby Bridge at the Belmont site

This application was irrevocably refused by a government inspector at the last application in 2020 and should not be allowed to be resubmitted.

The argument and supporting evidence against to incinerator is the same as previous and there is no change to the application so again this should be refused Sowerby Bridge is already suffering from pollution and in an AWM area so this application would have a further negative impact on the air quality in the valley.

It is disappointing to hear that the council have refused to vote on this and have reverted the decision to council officers

This is a huge waste of time and money and should simply be refused.

Please take my objection seriously.

Kind regards

XXXXX

561B Dear Sir / Madam

Subject: Objection

I am writing to voice my objection to the CVSH planning application to operate a waste incinerator in Sowerby Bridge at the Belmont site

The argument and supporting evidence against the incinerator is the same as the previous application that has been refused, and there is no change to the application, so again this should be thrown out.

Sowerby Bridge is already suffering from pollution and in an Air Quality Management area so this application would have a further negative impact on the air quality in the valley.

The fact that an incinerator is being constructed in a valley is ridiculous.

It is disappointing to hear that the council have refused to vote on this and have reverted the decision to council officers. This is a huge waste of time and money and should simply be thrown out.

Thanks

XXXXX

Sent from my iPad



562

Dear sir/madam,

I would like to object to the proposed use of the incinerator in Ryburn Valley.

In July 2023 a Government Planning Inspector refused the application due to concerns about the discharge of waste gases and their risks to the health of local people and the environment.

All elected representatives and MPs have opposed this application, reflecting strong local objections. Breathing clean air is a basic right that should be protected for our community.

Polluting gases from the chimney will not be dispersed above the level of the houses along the valley and hillsides but will be in the air breathed by all who live here. There are 9 schools within 1 mile and 18 schools within 2 miles of the chimney. The schools in close proximity are all above the proposed chimney height. A public footpath runs close to the site. Calderdale had the highest rate of respiratory tract infections in West Yorkshire for infants under one year in 2016 & asthma admissions in 2019.

The proposal uses data from the weather station at Leeds Bradford Airport to show that the gases will be dispersed. This is nowhere near the Ryburn Valley, and the landform is completely different. The steep sided Ryburn valley and prevailing winds mean that emissions will frequently blow towards the centre of the local population. In windless conditions, local residents regularly see smoke and mist hanging for long periods in the valley.

There are reasonable doubts as to whether CVSH would operate an incinerator correctly. Already, there have been several fires and there is also a flood risk. CVSH have shown the wrong postcode on the application for a place not at risk of flooding.

It is concerning that the application removes the Council's ability to request site diaries and inspection records to monitor compliance.

The risks to our air quality and health are simply too high.

The Met Office have said this is the kind of application we could not support as we could not meaningfully assess conditions within that narrow deep valley which would be prone to inversions/cold air pooling.

This reply from the Met Office must be very strong evidence that there should not be an incinerator on that site.

XXXXX

563

I am contacting you to place my objection to the environment permit application reference number S13/006

I object for the following reasons;

I live on XXXXX and based on the plume modelling previously made available the area I live in would be most impacted re air quality

The Met Office have recently confirmed that they can not meaningfully assess conditions on the site where the environment permit is intended therefore I am not confident in Calder Valley Skips Hire claim that the modelling done at Leeds and Bradford airport is a suitable reflection of any potential conditions

There are 27 schools, primary and secondary, in close proximity of the site – we need to protect the health of local children. There is no indication through the environmental permit application how this would be reliably achieved

Sowerby Bridge is already an area suffering from pollution issues and is classified as an Air Quality Management Area. Calderdale was reported as having the highest rate of respiratory tract infections in West Yorkshire in infants under one years old in 2016

The original application for this permit was refused following an appeal placed in July 2023 overseen by a Government Planning Inspector. This was due to concerns regarding the discharge of waste gases and the environment. It was demonstrated that this will not disperse above the level of the houses along the valley.

All elected representatives and MPs have opposed this application, which reflects the strong local objections to this application.

As residents of the local and the council who are custodians of the welfare of local people and the local environment please act in best interests on this occasion and utilise your right to make decisions with discretion that reflects the circumstances and context of this application.

Calder Valley Skip Hire does not have a reliable record of managing a waste disposal site safely, with several fires on site and being placed in a potential flood zone. It is concerning that this current application has removed the right for the

council to monitor diaries and inspection records. PLEASE NOTE CALDER VALLEY SKIP HIRE HAVE USED THE WRONG POSTCODE IN THEIR APPLICATION

Could you please tell me if the objections submitted to the council regarding this environmental permit application will be made public, and if the answer is no a reason for this.

XXXXX

564

I have noted with some concern that CVSH have submitted another application to operate an incinerator at their site on Rochdale Road. This seems to be a repeat of the previous application which was refused in July 2023 by the Government Planning Inspector so here are my grounds for objecting:

1) Why is another application even being considered when the previous decision wasn't appealed by the applicant? And why are the council wasting their time and our money dealing with the inevitable mountain of re-objections that are about to ensue?

2) Since the grounds for refusal last time were because of the height and proximity of the smoke stack to trees and woodland the government inspector was "unable to find that waste gases would be discharged in a controlled way to safeguard human health and the environment" and since the already-built stack is actually below the level of Rochdale Road, it would be a nothing short of a miracle if those waste gases aren't going to affect directly the air breathed in and around the locality.

3) Each ton incinerated equates to one ton of carbon dioxide released into the atmosphere. Perhaps this is why both Wales and Scotland have already banned any new permits. Will the council be insisting on carbon scrubbers being installed for example. Otherwise, they are basically applying to run a massive bonfire 5 days per week. Source: <https://ukwin.org.uk/facts/>

With a request to burn 2000kg per hour, this is roughly the carbon dioxide equivalent of running 2000 5kW log-burning stoves continuously. What are the council's plans for offsetting this and capturing the wasted heat?

4) Hoping to use a computer model for what is a unique (for incinerators) valley location based on data collected from a weather station some 20 miles away in a totally different topographical area would seem to be folly, unless of course there was some advantage to be had by the applicant. Naturally, as per the recent Horizon/Fujitsu case, any future case involving discounting of the risks involved would be laid at the door of the decision makers who will almost certainly be proven to have inadequately "safeguarded human health and the environment". Whatever legal threats have been made by CVSH, a crowd-funded class action at some future date would be much costlier to the council.

5) The frequent valley inversions would effectively channel the gases directly into Sowerby Bridge town centre ensuring a toxic smog in concentrations far above any legal limits

6) I strongly object to the council handing responsibility for monitoring emissions directly to CVSH themselves, effectively marking their own homework. This is a company with a proven track record for disregarding existing operating conditions

under which they were originally given planning for their recycling business. Specifically, a one-way operation with no reversing beepers was not implemented and the skip chains are not sleeved as per the original planning conditions. Nor is the bund constructed to design.

7) With a government target of 16 million tons of incinerator capacity, reducing to 11 million, and with existing over-capacity of 20 million the necessity to provide even more over-capacity is puzzling too. Since there are more jobs in recycling, this seems like an ideal way to create unemployment at the expense of local people's health.

I trust that you will read and respond to my significant concerns  
Kind regards

XXXXX

565

To whom it may concern,

I XXXXX wholeheartedly object to an environmental permit being granted to Calder Valley Skip Hire to operate a waste incinerator.

Firstly, With the risk to not only me and my families health but that of the wildlife we strongly object to the idea of even more pollution within where we live. What will it cost for us to be able to breathe fresh clean air?

Furthermore, I believe the site to be totally unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution. How can/ would these waste gases from the incinerator be discharged in a controlled way? Who will safeguard our health?

There's already smog that lies in the valley like a smothering plague. Inversion will allow waste gases from the incinerator to congregate and further damage the quality of air. With the insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict. This therefore puts the competence of CVSH to run an incinerator under considerable doubt.

The site itself is at high risk of flooding as its close to the river and retains all the water which comes down from the hills.

There are also already a considerable amount of lorries moving back and forth from the site leaving the patch of road directly outside the site in disrepair.

Lastly, we currently teach our young people to take care of the environment and respect it so it'll be around for years to come. It starts with the voices being heard from those that want to protect the future for themselves and others. We are the role models for those to come and by complying to polluting the environment further we won't ever promote real change.

I hope you consider my objections for the sake of the local community's health and overall well-being.

Everyone deserves to breathe clean air.

Yours sincerely  
XXXXX



566

Dear Sir.

As a local resident I wish to object in the strongest possible terms once again to Calder Valley Skip Hire's application to operate a waste incinerator on Rochdale Road, Sowerby Bridge.

- Firstly, Sowerby Bridge already suffers very poor air quality, indeed it is in an air quality management area such is the current pollution levels, therefore how on earth will operating a waste incineration site ½ mile up the road (and upwind) help in this case??
- Secondly, the height and proximity of the proposed smoke stack of the plant to the nearby trees & woodland mean that waste gases from the incinerator could not be discharged in a controlled manner which would safeguard human health & the environment.
- Thirdly, on a regular basis throughout the year mist & fog & smoke lie in the valley bottom throughout the year and inversion would surely stop waste gases from the incineration plant dispersing as is often seen after any fire in the valley. Such inversions are a common phenomena in our valley, so there must be better sights for a waste plant in other areas where such inversions don't occur.
- Lastly, Calder Valley Skip Hire needs to understand that this application has to be the last and that no further applications will be allowed.

Yours Faithfully,  
XXXXX

567

I and my family object to the installation of this incinerator. My wife has often life threatening asthma along with my grandchildren who live in the area.

Thanks  
Sent from my iPhone

568 Hello I would like to object to the CVSH application for a waste incinerator on their site.

The residents of Calderdale have complained about all the previous applications over the last 8 years. The government inspector has concerns about the emissions from any incinerator not dispersing properly in such a narrow valley.

We regularly see cloud inversion in this valley which would prevent emissions dispersing.

Sowerby Bridge is polluted enough without an incinerator pumping out even more gas.

I hope all the complaints are heard and this application is stopped

Regards

XXXXX

Sent from Outlook for Android

569 I am writing to voice my objection to the application of the waste incinerator in sowerby bridge where I live . This has already been refused by the inspector who said the waste could not be discharged in a controlled manner to safeguard human health and environment . Has a resident in sowerby bridge and with grandchildren going to school just closed to the site I am against the application .. please do the right thing and refuse the application

570 I am a resident of sowerby bridge which suffers from air pollution already so I am opposed to the application for the incinerator which has already been refused by the inspector who said the waste gases couldn't be discharged in a controlled way to safeguard human health and environment .please do the right thing and refuse the application

571

Hello,

I would like to make an objection to the application for an environmental permit reference S13/006. This site is unsuited for burning as it is in a deep-sided, tree-lined residential valley that already suffers high pollution. Wind direction in the valley is difficult to predict making this a possible disaster. Breathing clean air is a basic human right.

Best regards,  
XXXXX

572

Objection to Environmental Permit Application Reference: S13/006 Calder Valley Skip Hire (CVSH) Ltd

I object to this application per se. This is not a new application but a repeat of their earlier application with some additional material which in effect constitutes an appeal of the decision made by Inspector appointed by the Secretary of State. The Inspector's letter of his decision lays down the procedure for appealing that decision. The applicant has not followed that procedure but instead is attempting to circumvent the proscribed legal process by submitting this applicaion. The council must not be an accessory to this wrongful act and must therefore refuse the application. If they fail to do so I will support any action by the community for a High Court Judicial Review on the basis of procedural impropriety.

Please acknowledge this objection  
XXXXX

573

To whom it may concern

I am writing to vehemently oppose the proposed operation of a waste incinerator by Calderdale Skip Hire on Rochdale Road in Sowerby Bridge. This resubmission of an application previously refused at appeal in 2023 is deeply concerning, particularly given the detrimental impact it could have on our community and environment.

First and foremost, the operation of a waste incinerator poses serious risks to public health and safety. Incineration facilities release harmful pollutants into the air, including heavy metals, dioxins, and other carcinogens, which can have detrimental effects on respiratory health and overall well-being. Furthermore, the emissions from such facilities contribute to air pollution and climate change, with an exacerbating impact on our local environment.

Sowerby Bridge is already grappling with pollution issues and is situated within an air quality management area. The proposed incinerator, located a mere 670 meters downwind, poses an imminent threat to the health and well-being of residents. Inversion phenomena,

lingering in the valley bottom, often inhibit the dispersion of waste gases, exacerbating the risk of harmful emissions. The omission of the right for Calderdale Council to inspect records in the new application severely hampers the council's ability to monitor compliance, thus further jeopardizing the safety of our community.

I fail to see how the introduction of this incinerator aligns with the council's environmental emergency declared in 2019 and its ambitious target to achieve zero emissions by 2038, with significant progress targeted by 2030. Investing in sustainable solutions and reducing our carbon footprint are imperative in addressing the climate crisis. The operation of a waste incinerator not only contradicts these goals but also undermines the progress we have made towards creating a cleaner and more sustainable future for our community and future generations.

Breathing clean air should be a fundamental right for every community member. As articulated in Calderdale Council's Zero Emissions campaign, our borough is dedicated to protecting our distinctive environment and combating the adverse effects of climate change that we have experienced of late. However, the introduction of a waste incinerator directly contradicts these objectives and threatens to compromise the air quality and environmental integrity of Sowerby Bridge.

As the owner of Hob Hey Hideaways Norland, a small glamping business committed to providing an environment of clean air and natural beauty for our customers, I have invested significant resources, over the last 3 years, into creating a sustainable and eco-friendly retreat. Despite facing obstacles in obtaining planning permission for environmentally friendly accommodations, such as "green pods," (Incidentally, a planning rejection based solely on visibility from a public vantage point seems inconsistent, especially when considering the impact of a giant chimney for the incinerator.) I have persevered and recently obtained a freedom camping permit to offer year-round glamping accommodations. The proposed incinerator not only jeopardizes the health and well-being of my customers by compromising the air they breathe but also undermines the scenic beauty that attracts them to our site. This could ultimately devastate the business I have worked tirelessly to build.

In light of these concerns, I urge you to reject the proposed waste incinerator and prioritize the health, safety, and environmental well-being of our community and consider the impact this would have on small business such as mine. Together, let us uphold the values of clean air, sustainability, and environmental stewardship that define our borough. Thank you for considering my objections. I look forward to your prompt and thoughtful response.

Sincerely,  
XXXXX

574

From: XXXXX

Date: 31 March 2024 at 10:32:49 BST

To: XXXXX

Subject: NO TO INCINERATOR

Please register my vote AGAINST a INCINERATOR in SOWERBY BRIDGE.

IT is environmentally not suitable in all aspects.

NO TO A INCINERATOR in RYBURN VALLEY

Sent from my iPhone

575 To whom may concern .

I strongly object to the renewed application for a permit to operate a waste incinerator at Belmont or anywhere else in the Calder Valley.

The council should not be leaving the decision for this planning uni to planning officers who have no scientific background or relevant experience or qualifications.

The application should be turned down now and further applications denied.

The health and welfare of the people of Sowerby Bridge and surrounding area will suffer as a result of this application being passed.

Waste should not be incinerated it is going against the Climate Change objectives.

The council should abide by the previous decision the Government planning inspector of 5th July 2023 and the decision of the judicial review

Yours XXXXX

of XXXXX

576 To whom it may concern,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

Burning this amount of waste will have a profound negative impact on the air quality in our area, and therefore our health.

This borough ranks amongst some of the worst local authorities in the country for premature death rates due to respiratory disease.

The council has a duty to work to reduce air pollution, and therefore should not grant an application that may well worsen the problem. When Calderdale Council refused the Mearclough application in 2018, the reasons for refusal stated: It is accepted that there is no safe level of NOx and it is accepted that the SWIP site could impact on an AQMA. The application does not provide reasonable grounds to believe that it will not lead to an increase in NOx levels within the locality, but again there is no certainty that any action could be taken in the event of a breach." The Belmont site is equidistant to the Sowerby Bridge AQMA, and therefore this statement applies equally to the current application as to the former.

Dioxins are produced when burning Refuse Derived Fuel (RDF) and are described by the World Health Organisation (WHO) as "highly toxic and can cause reproductive and developmental problems, damage the immune system, interfere with hormones and can cause cancer". Dioxins are classified as Persistent Organic Pollutants and any analysis of potential receptors should include local businesses such as the Sowerby Bridge Day Nursery which is just down-stream from CVSH.

The Council must refuse an application for an environmental permit if it considers that the applicant will not operate the facility in accordance with the permit.

Unfortunately, Calder Valley Skip Hire has a poor relationship with its neighbours who allege that they have failed to abide by existing conditions resulting in hundreds of complaints. Council Officers had to intervene in 2015 after large stockpiles of waste accumulated on the Belmont site, causing a foul stench to linger throughout Sowerby Bridge. Furthermore, there was a large fire on the site in 2017, and smoke from this lingered in the valley for several days, as



noted previously in our objection.

Guidance for Council Officers on the competence of an operator can include.

Please do the right thing and abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Yours faithfully

XXXXX

577 Dear Sir/madam

I strongly object to the planning permission applied for for an incinerator in Sowerby Bridge .

The application is a resubmission dated 5th August 2020 which was refused at appeal on the 5th July 2023 by a government planning inspector XXXXX.

The government inspector said that given the height and proximity of the smokestack to trees and woodland he was “ unable to find that waste gases would be discharged

in a controlled way as to safeguard human health and the environment.

Sowerby bridge is already suffering from air pollution . It is an air quality management area and is only 670 metres downwind of the incinerator.

Smoke and mist regularly lie in the valley bottom.

Breathing clean air should be a basic right of any community .

This should not go ahead.

Yours XXXXX  
of XXXXX

578

XXXXX

On Sun, 31 Mar 2024 at 11:18, XXXXX wrote:  
Dear Sirs ,

I am writing to express my strong objection to the proposed construction of an incinerator in Sowerby Bridge.

As a resident of this community, I believe that such a facility would have detrimental effects on our health, environment, and overall quality of life. First and foremost, incinerators emit harmful pollutants into the air, including heavy metals, dioxins, and particulate matter. These pollutants pose serious health risks to the residents, especially vulnerable populations such as children, the elderly, and those with pre-existing health conditions. The potential increase in respiratory illnesses, cardiovascular diseases, and cancer rates is unacceptable.

Furthermore, the construction and operation of an incinerator would likely result in increased traffic, noise, and odour pollution in the surrounding area. This would not only disrupt the peaceful ambiance of our community but also decrease property values and discourage potential investment in the area.

Additionally, incineration perpetuates the unsustainable practice of waste disposal, rather than promoting more environmentally friendly solutions such as recycling, composting, and waste reduction.

We should be focusing on implementing strategies to minimise waste generation and maximize recycling rates, rather than resorting to outdated and harmful methods of waste management. I urge you to consider the long-term consequences of allowing an incinerator to be built in Sowerby Bridge.

Instead, I implore you to explore alternative solutions that prioritise the health and well-being of our community and the environment.

Thank you for considering my objections.

I trust that you will make the right decision for the future of Sowerby Bridge.

Sincerely,

XXXXX

Good afternoon,

I hope this email finds you well. I wanted to take a moment to express some personal sentiments regarding our shared community in Sowerby Bridge. As a family, we were initially drawn to this area by a sense of promise and potential. We believed in the upward trajectory of Sowerby Bridge and were inspired by the long-term plans and investments that seemed to signal a bright future.

Personally, I've been deeply invested in the idea of fostering community-managed gardens and green spaces within our neighborhood. The prospect of revitalising derelict sites with projects aimed at enhancing our environment and fostering a sense of togetherness has been a driving force for me. However, I find myself grappling with uncertainty as recent developments suggest a divergence from this vision.

The enthusiasm and drive to effect positive, resident-centered change in our area may diminish if the current trajectory continues. It's disheartening to imagine a future where the very essence of what drew us to Sowerby Bridge is compromised. Moreover, as my family prepares to welcome a new addition, the thought of losing access to the natural beauty of our surroundings is particularly distressing.

Walking through the woods, along the rivers, and by the canals has been a cherished family activity—one that has enriched our lives in countless ways. I beg those responsible at Calderdale Council to consider the broader implications of the decisions being made and the impact they will have on families like ours.

In addition to what I have said above, my other objections to the plans are shared by others and include:

1. Despite CVSH's reliance on data from Leeds/Bradford airport to demonstrate natural waste clearance, it's important to note that our valley is distinct from the airport environment, rendering such comparisons ineffective.
2. Considering Sowerby Bridge's already elevated pollution levels, exacerbated by our proximity to the motorway and frequent closures leading to increased traffic flow, it's crucial to assess the potential impact on air quality.
3. It's concerning that the company and its shareholders are attempting to circumvent a higher court ruling, which raises questions about the integrity of the process.

4. The chimney's height notably falls short of surrounding trees and the hillside, not to mention Norland above, highlighting potential discrepancies in its environmental impact assessment.

5. The presence of numerous houses and residents in our immediate vicinity underscores the density of population and infrastructure, which should be carefully considered in any proposed developments.

I sincerely hope that this isn't the beginning of the end for our connection to this community and the values we hold dear. Your thoughtful consideration of these concerns is greatly appreciated, and I remain hopeful for a future where our aspirations for Sowerby Bridge can continue to flourish.

Thank you for taking the time to listen.

Kind regards,

XXXXX

580 Calder Valley Skip Hire SWIP application - Objection.  
Ref S13/006

#### Issues of concern

##### 1. Unknown impact on human health : harmful emissions

The modelling of air pollution does not satisfactorily represent the conditions in the valley even with rough surface calculations. The stack height is low, the point of emission is near level with the houses on Rochdale Road and the mixing of air / dilution of pollution at the point of emission is unknown. There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on 1 particular model which does not allow for the topography, the woodland, the inversions in this valley. Each report for air quality, uses terms like, estimates, projected, calculated based on a model of air distribution at Leeds airport. Some parameters have been set with the agreement of CVSH which is inappropriate. The valley suffers from inversions which will keep the pollution in the air that we breathe at low levels. The stack height should be much higher in this location.

Is it really acceptable to allow a risk to human health levels of dioxins and furans are predicted to be higher in the area and yet these are only estimates. On this basis alone the permit should be refused. The flue is not high enough to achieve dilution - the risk to human health has not been adequately determined and the effect on human health will be SIGNIFICANT.

##### 2. Air quality

The addition of this significant amount of emissions to atmosphere will impact on air quality within the boundary. The data provided by the applicant shows much higher pollution levels at Spring hill mills area, this is due to prevailing wind conditions. Pollutants when they are able to disperse in the winter months will likely blow into the AQMA having a seriously detrimental impact on air quality within the AQMA and surrounding areas.

The original submission suggested that there won't be an increase in waste transfer in or out of site. This is incredulous. A business will operate to achieve maximum profit. It is profitable now bringing in waste sorting and moving waste to landfill. This operation will continue and the site will take in more waste to burn - numbers of vehicles to site will likely double if not triple. The effect on the AQMA will be SIGNIFICANT.

### 3. Noise

The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door open for much of the time impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that during the day but especially at night.

### 4. Flora and Fauna

Much has been made of the trees which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact of hot gases on these trees, how these harmful chemicals will affect the local ecology? Deer roam the woods, badgers, cuckoos etc the woods are alive with birds and animals, how is nature to be protected. The flue is not high enough to allow gases to escape and the environment will be harmed.

### 5. Enforcement

CMBC have insufficient resources to ensure adequate enforcement, there is a severe lack of specialists to deal with such a site, there is also an apathy towards enforcement. The Authority has been threatened with litigation by CVSH, how so can they then take enforcement action against them now?

### 6. Probable amendment to hours of operation

As above the company will want to make profit, it is likely (more than likely) that they will want to extend operating hours which will further impact on the matters raised above.

Refusal - inadequate dispersal and dilution of chemicals which are harmful to human health

- \*The stack height is inadequate

- \*Dilution is negatively affected by this valley location.

- \*Dispersal is negatively affected by the location of the emission point

- \*Dispersal is negatively affected by the trees

- \*Dispersal is negatively affected by inversion

- \*Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology.



The permit should be refused.

Calder Valley Skip Hire SWIP application - Objection.  
Ref S13/006

Issues of concern

1. Unknown impact on human health : harmful emissions

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- \*Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology.

The permit should be refused.

583 To whom it may concern,

I am absolutely disgusted and concerned to hear that after already being refused, once again they are trying Sowerby Bridge already suffers from pollution and is in an air quality management. This is extremely concerning for health of everyone living nearby as well as the fact that this could affect local businesses. People will not want to sit out in beer gardens if the air is polluted. I am extremely concerned as a home owner, as well as a business owner. It is even more concerning that the new application has removed the permission for Calderdale to request copies of inspection records.

The government inspector already stated that he was 'unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment'.

I think it's absolutely appalling that the decision for this now lies on the decision of a few council officials, without even a proper vote.

The whole thing is very worrying. The health and wellbeing of villagers and visitors is at stake. As well as affecting house prices as no one will want to live here..and affecting businesses as people won't want to visit either.

Can you please see sense and ensure that this is stopped.

Thank you

XXXXX

Also business owner at XXXXX

Sent from Outlook for Android

584

31/3/24

Dear Sir

Calder Valley Skip Hire SWIP application - Objection.

Ref S13/006

Issues of concern

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### REFUSAL ON THE GROUNDS:

Inadequate dispersal and dilution of chemicals which are harmful to human health.

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\*Dilution is negatively affected by the location of the of the plant in the valley bottom \*Dispersal is negatively affected by the location of the emmission point of the flue \*Dispersal is negatively affected by the trees \*Dispersal is negatively

affected by inversions \*Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology.

THE PERMIT SHOULD BE REFUSED.

Yours faithfully

XXXXX

Sent from my iPhone



585 To whom it may concern,

I am writing to express my vehement objection to the proposed construction of an incinerator in Sowerby Bridge. As a concerned local resident, I am deeply worried about the potential detrimental effects that such a facility could have on air quality, public health, and the well-being of our community.

The prospect of an incinerator in our vicinity raises serious concerns regarding air pollution, a critical issue that directly impacts the health and quality of life of residents. Incinerators emit harmful pollutants and toxins into the air, including particulate matter, nitrogen oxides, and dioxins, which pose significant health risks, particularly to vulnerable populations such as children, the elderly, and individuals with respiratory conditions. Me and my wife moved to the area this year on the understanding the area is a cleaner air zone.

Furthermore, the proposed location of the incinerator in Sowerby Bridge is alarming due to its proximity to residential areas, schools, and healthcare facilities. The potential release of hazardous pollutants into the air poses an unacceptable risk to the health and safety of our community members, who deserve to live in an environment free from the threat of harmful emissions and pollutants.

Additionally, the construction and operation of an incinerator could have adverse effects on the local environment, including increased traffic congestion, noise pollution, and the degradation of air and water quality. Such developments could also deter visitors, impact local businesses, and diminish the appeal of Sowerby Bridge as a desirable place to live and work.

I urge the council to prioritize the well-being and interests of local residents by rejecting the proposal for the incinerator in Sowerby Bridge. Instead, I implore you to explore alternative waste management solutions that prioritize sustainability, environmental protection, and the health of our community.

Thank you for considering my concerns. I trust that you will take decisive action to safeguard the health, safety, and welfare of Sowerby Bridge residents.

Sincerely,  
XXXXX

586 Please take this email as my official objection to the waste incineration application being granted in the Ryburn Valley.  
xxxxx

587 Dear Sir/madam

I object to the application for a permit to operate a wasted incinerator at Belmont by Calder Valley Skip hire.

This is a major threat to the health of residents in the immediate vicinity.

The council needs to abide by the previous decision of the government planning inspector on 5th July 2023

XXXXX

588

Hello,

I own a house on Rochdale Road just a few hundred yards from Calderdale Valley Skip Hire.

To hear of another renewed application for an incinerator(despite the many previous objections and refusals) is distressing. I have Asthama, I'm also hoping to start a family soon. The quality of air through both the incinerator and wagons bringing waste in will be hugely detrimental to my health and my family's health and I have major concerns for the local environment, trees and wildlife.

Some further points I'd like to make:

- the site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution and it is close to a air quality management area
- The site is within 2km from more than 8 schools
- Homes, residential areas and businesses are all in the area
- the site is at risk from flooding
- insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict
- Calder Valley Skip Hire have not displayed any competence to to run an incinerator

Please ensure this doesn't go ahead and protect our clean air!

Thank you  
XXXXX

589

Hi

Please take my email as an objection to the above and in support of all other objections.

Issues of concern

1. Unknown impact on human health : harmful emissions The modelling of air pollution does not satisfactorily represent the conditions in the valley even with rough surface calculations. The stack height is low, the point of emission is near level with the houses on Rochdale Road and the mixing of air / dillution of pollution at the pount of emission is unknown. There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on 1 particular model which does not allow for the topography, the woodland, the inversions in this valley.

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The original submission suggested that there wont be an increase in waste transfer in or out of site. This is incredulous. A business will operate to achieve maximum profit. It is profitable now bringing in waste sorting and moving waste to landfill. This operation will continue and the site will take in more waste to burn - numbers of vehicles to site will likely

double if not triple. The effect on the AQMA will be SIGNIFICANT.

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The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door open for much of the time impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that during the day but especially at night.

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Much has been made of the trees which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact of hot gases on these trees, how these harmful chemicals will affect the local ecology? Deer roam the woods, badgers, cuckoos, the woods are alive with birds and animals, how is nature to be protected. The flue is not high enough to allow gases to escape and the environment will be harmed.

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CMBC have insufficient resources to ensure adequate enforcement a severe lack of specialists to deal with such a site, and there is also an apathy towards enforcement. The Authority has been threatened with litigation by CVSH, how so can they then take enforcement action against them now?

6. Probable amendment to hours of operation As above the company will want to make profit, it is likely (more than likely) that they will want to extend operating hours which will further impact on the matters raised above.

### REFUSAL ON THE GROUNDS:

Inadequate dispersal and dilution of chemicals which are harmful to human health.

\*The Stack height is inadequate

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Kind Regards  
XXXXX

590 To whom this may concern,

I live on Rochdale Road in Sowerby Bridge just a few hundred yards from Calderdale Valley Skip Hire.

To hear of another renewed application for an incinerator(despite the many previous objections and refusals) is distressing. The quality of air through both the incinerator and wagons bringing waste in will be hugely detrimental to my health and my family's health and I have major concerns for the local environment, trees and wildlife.

Some further points I'd like to make:

- the site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution and it is close to a air quality management area
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- Calder Valley Skip Hire have not displayed any competence to to run an incinerator

Please ensure this doesn't go ahead and protect our clean air!

Kind regards

XXXXX

591 I am writing to object to the proposed incinerator on Rochdale Road in Sowerby Bridge. Please consider the health of the residents and refuse this development.

Thank you

XXXXX

Sent from my iPhone

592 Dear Sir / Madam

I am writing to ask that permission is refused for the siting of a proposed waste incinerator on Rochdale Rd Sowerby Bridge.

Sowerby Bridge already suffers from pollution and the suggested position of this incinerator would contribute to this. Waste gases would not be blown away but linger in the valley where residents would have no option but to breathe in the polluted air.

The ADMS computer model does not use local weather data and cannot accurately predict that fumes will not linger in the valley. Mist and fire smoke can be seen staying, so why should this discharge be guaranteed to be different?

This is not what a council should agree to.

Yours Sincerely

XXXXX



593

Hello,  
I write in support of my Nephew who  
owns a house on Rochdale Road just a few hundred yards from Calderdale Valley Skip Hire.

His objections, which I support are as follows:

To hear of another renewed application for an incinerator(despite the many previous objections and refusals) is  
distressing. The quality of air through both the incinerator and wagons bringing waste in will be hugely detrimental to his  
health and his family's health and he has major concerns for the local environment, trees and wildlife.

Some further points he'd like to make:

- the site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution  
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- Calder Valley Skip Hire have not displayed any competence to to run an incinerator

Please ensure this doesn't go ahead and protect our clean air!

Thank you

XXXXX

594 Calder Valley Skip Hire SWIP application - Objection.

Ref S13/006

Issues of concern

1. Unknown impact on human health : harmful emissions

The modelling of air pollution does not satisfactorily represent the conditions in the valley even with rough surface calculations. The stack height is low, the point of emission is near level with the houses on Rochdale Road and the mixing of air / dilution of pollution at the point of emission is unknown. There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on 1 particular model which does not allow for the topography, the woodland, the inversions in this valley.

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- \*Dispersal is negatively affected by inversions

- \*Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology.

THE PERMIT SHOULD BE REFUSED

595

Happy Easter

I wrote to object to the original application and find that I am writing the same email (with almost identical content) to object to this new application.

In my original submission, I commented on the fact that the evidence in support (air quality) was invalid as it was not consistent with the topology of the site - the site being heavily wooded in a steep sided valley. The air quality in the area is already poor, regularly exceeding lawful limits (pollutants) and the application does not provide sufficient evidence that there will be no increase in NOx levels.

In relation to the topology, I move onto the weather statistics. The data supplied relates to a site some 20 miles away with a completely different outlook - a site that has a clear and open aspect on all sides (consistent with this being an airport). The proposed site sits within the shadow of Norland Moor (a further 80 metres higher than the Leeds-Bradford site) in a valley that has a long standing history of inversions. This results in low hanging clouds which have been known to sit in the valley for hours and, occasionally, days. It is, therefore, a safe assumption that any fumes from said incinerator would result in the same.

Finally, I have doubts that the site can be properly operated or enforced. The original application (Mearclough) was refused, by cabinet, citing concerns over the enforcement of the site where the operations are governed by 2 separate permits. Nothing has changed. The operators also, according to residents, have a poor record in complying with existing conditions. This does not bode well and the council would be within their rights to refuse purely on the grounds of competence to run the installation according to permit conditions.

Regards

XXXXX

Sent from Outlook for iOS

596 Calder Valley Skip Hire SWIP application - Objection.

Ref S13/006

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Is it really acceptable to allow a risk to human health levels of dioxins and furans are predicted to be higher in the area and yet these are only estimates. On this basis alone the permit should be refused. The flue is not high enough to achieve dilution - the risk to human health has not been adequately determined and the effect on human health will be SIGNIFICANT.

2. Air quality

The addition of this significant amount of emissions to atmosphere will impact on air quality within the boundary. The data provided by the applicant shows much higher pollution levels at Spring hill mills area, this is due to prevailing wind conditions. Pollutants when they are able to disperse in the winter months will likely blow into the AQMA having a seriously detrimental impact on air quality within the AQMA and surrounding areas.

The original submission suggested that there won't be an increase in waste transfer in or out of site. This is incredulous. A business will operate to achieve maximum profit. It is profitable now bringing in waste sorting and moving waste to landfill. This operation will continue and the site will take in more waste to burn - numbers of vehicles to site will likely

double if not triple. The effect on the AQMA will be SIGNIFICANT.

### 3. Noise

The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door open for much of the time impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that during the day but especially at night.

### 4. Flora and Fauna

Much has been made of the trees which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact of hot gases on these trees, how these harmful chemicals will affect the local ecology? Deer roam the woods, badgers, cuckoos, the woods are alive with birds and animals, how is nature to be protected. The flue is not high enough to allow gases to escape and the environment will be harmed.

### 5. Enforcement

CMBC have insufficient resources to ensure adequate enforcement a severe lack of specialists to deal with such a site, and there is also an apathy towards enforcement. The Authority has been threatened with litigation by CVSH, how so can they then take enforcement action against them now?

### 6. Probable amendment to hours of operation

As above the company will want to make profit, it is likely (more than likely) that they will want to extend operating hours which will further impact on the matters raised above.

### REFUSAL ON THE GROUNDS:

Inadequate dispersal and dilution of chemicals which are harmful to human health.

- \*The Stack height is inadequate

- \*Dilution is negatively affected by the location of the of the plant in the valley bottom

- \*Dispersal is negatively affected by the location of the emission point of the flue

- \*Dispersal is negatively affected by the trees

- \*Dispersal is negatively affected by inversions

- \*Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology.

THE PERMIT SHOULD BE REFUSED



597 Calder Valley Skip Hire SWIP application - Objection.

Ref S13/006

Issues of concern

1. Unknown impact on human health : harmful emissions

The modelling of air pollution does not satisfactorily represent the conditions in the valley even with rough surface calculations. The stack height is low, the point of emission is near level with the houses on Rochdale Road and the mixing of air / dilution of pollution at the point of emission is unknown. There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on 1 particular model which does not allow for the topography, the woodland, the inversions in this valley.

Each report for air quality, uses terms like, estimates, projected, calculated based on a model of air distribution at Leeds airport. Some parameters have been set with the agreement of CVSH which is inappropriate. The valley suffers from inversions which will keep the pollution in the air that we breathe at low levels. The stack height should be much higher in this location.

Is it really acceptable to allow a risk to human health levels of dioxins and furans are predicted to be higher in the area and yet these are only estimates. On this basis alone the permit should be refused. The flue is not high enough to achieve dilution - the risk to human health has not been adequately determined and the effect on human health will be SIGNIFICANT.

2. Air quality

The addition of this significant amount of emissions to atmosphere will impact on air quality within the boundary. The data provided by the applicant shows much higher pollution levels at Spring hill mills area, this is due to prevailing wind conditions. Pollutants when they are able to disperse in the winter months will likely blow into the AQMA having a seriously detrimental impact on air quality within the AQMA and surrounding areas.

The original submission suggested that there won't be an increase in waste transfer in or out of site. This is incredulous. A business will operate to achieve maximum profit. It is profitable now bringing in waste sorting and moving waste to landfill. This operation will continue and the site will take in more waste to burn - numbers of vehicles to site will likely

double if not triple. The effect on the AQMA will be SIGNIFICANT.

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The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door open for much of the time impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that during the day but especially at night.

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Much has been made of the trees which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact of hot gases on these trees, how these harmful chemicals will affect the local ecology? Deer roam the woods, badgers, cuckoos, the woods are alive with birds and animals, how is nature to be protected. The flue is not high enough to allow gases to escape and the environment will be harmed.

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- \*Dispersal is negatively affected by the trees

- \*Dispersal is negatively affected by inversions

- \*Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology.

THE PERMIT SHOULD BE REFUSED

598 I am writing to voice my concerns about the proposal for incinerator in SB.  
As well as concerns to the local town , what about the effect it will have on the environment as well as wildlife .  
Thinking about children and adults alike with Respiratory conditions . It's a bottle neck of fumes in the town due to one road through as it is !!  
This is going to cause nothing but heartache to an already dying town.  
Would you or they want it on their doorsteps ?? I think not !!!  
In an age when we are questioning pollution in built up areas ? Why is this even being brought into question ?  
It should be NO without Question !!  
Kind Regards  
XXXXXX  
Sent from my iPhone

599 Hi

I would like to object against the proposed S13/006 plan for the incinerator in Sowerby Bridge.

In 2024, when we are supposedly trying to be ecologically better, it is a backwards step. The idea of this in such a populated area is a complete mistake

Regards

600 Re: Calder Valley Skip Hire application to Calderdale Council for environmental permit to operate an incinerator plant on Rochdale Road, Sowerby Bridge.  
I am writing.....

#### Obligations under Environment Act (2021)

Before looking at the more specific circumstances and implications of an incinerator on this site, under the Environment Act 2021, the government has set legal-binding targets to reduce Particulate Matter (PM)<sub>2.5</sub> concentrations progressively by 2040 to no more than 10 $\mu$ g/m<sup>3</sup>, and an average population exposure reduction target of 35% by the same time, with interim targets. Therefore, any activity that, by definition, can only increase PM<sub>2.5</sub> concentrations should be considered contrary to achieving these targets, which in themselves are already less ambitious than the World Health Organisation (WHO).

#### Impact on air quality and quality of life in Sowerby Bridge & surrounding areas

The proposed location of the incinerator is in steep-side valley, which under earlier local plans was at one time suggested as a greenway linking Sowerby Bridge with Triangle and Ripponden. It retains a network of paths that are used for recreation and which could be developed, as once envisaged, to promote safe active travel.

The topography of the proposed site is not conducive to the rapid dispersal of particulates, especially in still weather. Furthermore, given that the prevailing wind direction is south westerly, particulates when dispersed, are likely to 'flow' towards the centre of Sowerby Bridge, which already suffers from high levels of traffic congestion and lies in a dip, making it a potential 'sink' for a build up of particulates. The centre of Sowerby Bridge has been earmarked (according to local publicity) for the creation of an outdoor recreational space where the market used to be, but will be unhealthy to residents when air quality is sub-optimal, with those who have asthma, chronic obstructive pulmonary disease and other breathing difficulties the most affected. Calderdale already has issues with asthma and respiratory tract infections being amongst the highest in West Yorkshire for certain age groups.

#### Impact on local schools and young people's health

Additionally, there are eighteen schools within a two miles radius of the incinerator and nine schools within a one-mile radius of the proposed incinerator, with those schools in closest proximity all above the proposed chimney height. During the covid pandemic, those schools without air conditioning (most of them) were frequently told that the circulation of 'clean' air (i.e., opening windows) was a vital element of limiting the likelihood of contracting the airborne virus (and it, of course, remains good practice today). If the incinerator goes ahead, local schools will be faced with a dilemma: do we open the windows to reduce the likelihood of contracting a virus; or do we close them to keep out harmful particulates?

#### Impact on congestion

The increase in PM<sub>2.5</sub> is only one of the areas of concern regarding the impact of the proposed incinerator on air quality;

another is extra road traffic. The A58 between Sowerby Bridge and Triangle is already extremely congested, especially at peak times. Furthermore, the road is a regularly-used diversionary route for the frequently-closed M62. The additional traffic that an incinerator would create will only add to this congestion and further increase air pollution. The road surface between Sowerby Bridge and Triangle is already of poor quality and deteriorating, despite occasional attempts at partial repairs, and will only decline further with the additional traffic. It would also be a further disincentive to active travel, especially by cyclists, in the absence of a greenway route, as an already dangerous road, with no cycling infrastructure, becomes ever more dangerous.

The operator's proposal

It is already well documented that climate change is increasing rainfall in the UK, including in Calderdale and the Ryburn Valley. Therefore, a proposal to build an incinerator in an area at increased risk of flooding seems, at best, foolhardy and at worse, nonsensical. There is a history of fires on the site, as well as potential inaccuracies in some elements of the proposal, such as the inclusion of weather data from Leeds/Bradford Airport (some 20 or so miles away with a completely different topography) and postcode data. The application appears to remove, or limit, the Council's ability to request site diaries and inspection records to monitor compliance. These factors lead to reasonable doubts about the future management and operation of an incinerator.

Taking the above into consideration, we wish to join our local elected representatives in opposing this application. Breathing clean air is a basic right that should be protected for our community, and especially for those who are most vulnerable to the impacts of poor air quality and who have the least resources to deal with its impact on their lives. A site that has evolved from a small depot surrounded by woodland and recreational paths, has already morphed into a substantial waste disposal business. Further expansion would be the wrong development in the wrong location. Therefore, please refuse this application. The risks to our air quality and health are simply too high.

601     Good afternoon,  
  
I would like to raise my objection to the incinerator.  
  
Thanks  
  
XXXXX

602 Dear Calderdale MBC Environmental Health,

Consultation ending 1st April 5pm

I am writing to express my strong objection to Calder Valley Skip Hire's application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

This is a resubmitted application after their original proposal was rightfully refused at appeal in July 2023 by a Government Planning Inspector due to concerns about the discharge of waste gases and protecting human health and the environment.

Sowerby Bridge is already an Air Quality Management Area suffering from pollution issues. Having the incinerator just meters away with its smoke and emissions regularly blowing into the valley bottom is unacceptable. There are valid doubts about the air quality models presented not accurately accounting for local weather patterns and inversions that can trap pollutants.

Furthermore, it is extremely concerning that the new application has removed the Council's ability to request site diaries and inspection records to monitor compliance. There must be transparency and oversight over operations.

All elected representatives - councilors across parties and MPs - have rightly opposed this application from the start.

Breathing clean air is a BASIC RIGHT that should be protected for our community.

The 'health impact statement' in the application states, that the release of pollutants, particularly dioxins ( carcinogens), will have a 'minimal impact,' therefore that indicates that it will have some impact, which is not acceptable .

I urge you to listen to the residents and reject this incinerator permit application once again. The risks to our air quality, environment and health are simply too high.

In summary:

- In July 2023 a Government Planning Inspector refused the application due to concerns about the discharge of waste gases and their risks to the health of local people and the environment.
- All elected representatives and MPs have opposed this application, reflecting strong local objections. Breathing clean air is a basic right that should be protected for our community



- Polluting gases from the chimney will not be dispersed above the level of the houses along the valley and hillsides but will be in the air breathed by all who live here. There are 9 schools within 1 mile and 18 schools within 2 miles of the chimney. The schools in close proximity are all above the proposed chimney height. A public footpath runs close to the site. Calderdale had the highest rate of respiratory tract infections in West Yorkshire for infants under one year in 2016 & asthma admissions in 2019.

The Mayor of the West Yorkshire Partnership and Combined Authority and partner councils (which includes Calderdale), Tracy Brabin, has issued the following:

The Mayor's Big Climate Chat  
[westyorks-ca.gov.uk](https://www.westyorks-ca.gov.uk)

<https://www.westyorks-ca.gov.uk/growing-the-economy/tackling-the-climate-and-environmental-emergency-in-west-yorkshire/the-mayor-s-big-climate-chat/>

How does the application from CVSH fit with this and equally as important, CMBC's response to the action they are taking for local people?

The proposal uses data from the weather station at Leeds Bradford Airport to show that the gases will be dispersed. This is nowhere near the Ryburn Valley and the landform is completely different. The steep-sided Ryburn valley and prevailing winds mean that emissions will frequently blow towards the centre of the local population. In windless conditions, local residents regularly see smoke and mist hanging for long periods in the valley.

- There are reasonable doubts as to whether CVSH would operate an incinerator correctly. Already, there have been several fires and there is also a flood risk into our rivers. CVSH have shown the wrong postcode on the application for a place not at risk of flooding.

- It is concerning that the application removes the Council's ability to request site diaries and inspection records to monitor compliance.

I request that this application is refused. The risks to our air quality, the environment and our health are unacceptably too high.

XXXXX

603

To: Calderdale MBC Environmental Health

Re: Calder Valley Skip Hire (CVSH) application for Environmental Permit Ref S13/006

From: XXXXX

I wish to object in the strongest possible terms to this application from CVSH for an Environmental Permit to operate a Small Waste Incineration Plant (SWIP). I live on the XXXXX , barely XXXXX metres from the proposed site and this is a completely inappropriate site in which to build an incinerator. Whilst Calderdale MBC like any local authority may conclude that incineration can be part of a coherent waste management strategy, to grant an Environmental Permit on this site for this incinerator amounts to a "PERMIT TO POLLUTE". There are numerous grounds on which I believe this application should be rejected and indeed this latest application should not even have been accepted on procedural grounds.

1. THIS IS NOT A NEW APPLICATION. This application is not in fact a new application, but a re-submission of the one on the 5 August 2020, with a few minor alterations. That application was refused on appeal on 5 July 2023 by John Woolcock on behalf of the Secretary of State (APP/EPR/603). According to the government's Environmental Permit - guidance on the appeals procedure ([www.gov.uk/government/publications/environmental-permit-appeal-form/environmental-permit-guidance-on-the-appeal-procedure](http://www.gov.uk/government/publications/environmental-permit-appeal-form/environmental-permit-guidance-on-the-appeal-procedure)) section 4.5.1 states that this decision is Final and section 4.5.2 states that the decision can only be challenged by judicial review within 3 months of the decision which CVSH elected not to do. For it to be treated as a new application is an abuse of process and it should be rejected immediately.

2. TOPOGRAPHY. The proposed site of the incinerator is at the bottom of a narrow, steep sided valley, shaped like the hull of a ship. Predicting dispersion of emissions in such unique terrain is extremely complicated and the computer modelling does not demonstrate that this has been taken into account. The prevailing westerly winds will carry the emissions straight down the A58 corridor into the Sowerby Bridge Air Quality Management Area which is only 670 metres downwind. The application cites this distance as though it is an argument in support of the incinerator, whereas any reasonable examination of the facts will demonstrate it is not. Furthermore, on days when there is little wind or a temperature inversion residents frequently observe cloud, mist and smoke hanging in the valley for days. One such occasion was when there was a fire at the CVSH site and the smoke lingered in the air for several days. We can therefore expect that emissions will either be funnelled into the AQMA in Sowerby Bridge or hang in the valley and disperse up the valley sides.

3. INAPPROPRIATE MODELLING. The ADMS computer model does not use local weather data for the dispersion

modelling instead using that from Leeds Bradford Airport. Leeds Bradford Airport is 20 miles away and is England's highest airport at an elevation of 208m, with an open aspect in every direction. The site of the proposed incinerator is in the bottom of a narrow valley surrounded by trees. As the assumptions on which the modelling is based are so different from the actual location this renders the modelling invalid.

4. HEIGHT OF STACK. John Woolcock in his report said that the height and proximity of the smoke stack to trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled ways to safeguard human health and the environment". The top of the stack would not even reach the level of the road, let alone the trees, emissions will therefore disperse directly into the wooded environment and into residents' homes in the surrounding valley.

5. WEAKENING OF INSPECTION REGIME. One of the minor changes in the latest application is to remove from the inspection regime the right of Calderdale Council to "request copies of the inspection records at any time". Effectively removing the ability of the Council to monitor compliance with safe running of the incinerator.

6. IMPACT ON HEALTH OF LOCAL POPULATION. This is understandably the main concern of local resident. Given the above points, there is no assurance that the incinerator will not cause significant detrimental health impacts on the local community. This is in direct contradiction of the stated aims of Calderdale and West Yorkshire health partnership aims. There is evidence of increased ill health particularly respiratory conditions in populations living in the vicinity of incinerators. Residents of Sowerby Bridge have the right to expect that they can breathe clean air and that the Local Authority is working to improve that rather than make it worse!

7. NOT CONSISTENT WITH ENVIRONMENTAL COMMITMENTS. Scotland and Wales have placed a moratorium on the building of new incinerators and there is growing pressure for England to do the same. For a Council that prides itself on it's environmental credentials, this is the wrong message to be sending.

8. UNIVERSAL OPPOSITION. All elected members of all parties are opposed to this development. This includes MPs Holly Lynch and Craig Whittaker as well as 9 local councillors from Ryburn, Sowerby Bridge and Greetland & Stainland. There is also universal opposition from residents locally and I believe the above points illustrate that this is based on sound reasons. It is unfortunate that elected Councillors on Cabinet have delegated the decision on this application to Council Officers and it is not clear to me why this is the case. This raises the real question of whether democracy is being served in this process.

In conclusion, I strongly urge whoever makes this decision, to listen to the will of the people and reject this application for an Environmental License.

Yours sincerely

XXXXX

604

I object to the granting of an Environmental Permit for Schedule 13 SWIP for Calder Valley Skip Hire incinerator in Sowerby Bridge, ref. S13/006

Since CVSH have chosen to ignore the result of their previous appeal, Appeal Ref: APP/EPR/603, and the findings of the government inspector regarding the insufficient stack height of 12 metres, I see that little has changed since my previous objection. Therefore I am repeating the same reasons for objection, numbered below.

In addition to my previous objection, and having the benefit of attending the two day appeal hearing at the Piece Hall in November 2022, I would add the following reasons:

- a) The 12 metre stack height has already been ruled as being insufficient by the government inspector. There is no appropriate meteorological data for this location which could be sensibly used to justify the findings of the CVSH experts using their modelling software. The met office have already stated to another objector that they do not have meteorological data for the Ryburn Valley and that they do not believe data from Leeds/Bradford airport would be relevant. Please see my original objection below, reason 2, regarding temperature inversions and photographic records.
- b) I have worked with, designed and developed software for over 40 years, and am fully aware of the way it works and the way modelling software works. At the hearing in the Piece Hall, I asked the CVSH experts about their model and the truth is, the model is only as good as the data that is fed in and the detail in the model itself. We can already see that the meteorological data is not accurate enough for this location. For this reason I do not believe the CVSH stack height calculation to be sufficient.
- c) All things considered, I cannot see why CVSH refuse to consider a greater stack height. They seem to want to believe their own data and deny the efficacy of any other view. I think this intransigence makes them unsuitable as an organisation to operate such a complex plant located in a problematic location, upwind of a major population centre which already suffered air quality issues.

My personal reasons for objection prior to the previous appeal still stand. These are:

- 1) With Sowerby Bridge already being an Air Quality Improvement Zone, and also being the current escape route for M62 traffic travelling Eastward, as happened recently due to the closure of the M62, it is clear our air quality is already poor. As an asthmatic, I can literally feel the quality of the air in my lungs when it is bad. I feel unable to do any recreational running already, in the valley, when the air quality is low. I cannot see any way in which having an incinerator upwind of the town, in a steep sided valley, can do anything but lower the quality of our air, permanently.
- 2) I live XXXXX and, irrespective of what any scientific studies might say about movement of the air in the valley and plume dispersal, I have years of personal observations from my home of what actually happens to the air...

- In quiet conditions, smoke just hangs in the valley, forming a layer about level with the fields below Ryburn Valley High School.
- In windy conditions, it moves down the valley into Sowerby Bridge without ever rising above the level I previously stated.
- I have multiple examples of photographic evidence I can provide on request, going back many years. I am not simply talking about temperature inversions. I have photographic and video evidence of bonfires on the Norland and Sowerby hillsides, directly above Belmont, showing the smoke moving slowly down or up the valley, hardly dispersing, and not rising. If this is the case for a fire a hundred feet or more above the top of the stack, how can I believe the incinerator fumes will behave differently to this. Photographic evidence is provided below. Full size versions or video files can be provided on request.

This is an example of a temperature inversion trapping weather and smoke in the valley. This was taken on 11th November 2018 around 11am. This formation had been stable all morning and remained so for another hour afterwards. You will be aware that temperature inversions are a very regular weather event in the Ryburn Valley. Not all of them are spectacular or even visible, but all of them trap whatever is in the air in the valley and keep it there for hours.

This picture shows a relatively small fire or chimney on the Sowerby Hillside slightly higher up the valley side, well above the height of the CVSH stack. It is clear to see that the smoke reaches a certain height and then drifts down the valley towards Sowerby Bridge, clinging to the hillside. The key point here is that a very small amount of smoke disperses close to the ground on the valley side and affects a wide area.

This picture shows the plume of a fire of some kind in the valley bottom on the morning of November 23rd 2020. I have video of this plume showing how it rises to the level I mentioned above and then slowly drifts up the valley towards Triangle, but never dispersing. I suspect the fire was at Belmont but I cannot be certain.

The example below shows the wind blowing to the South. It is clear to see where the smoke is going. It is not rising but covering the hillside.

I hope you will consider real world observations as you make your deliberations. I have no objection in principle to the use of incinerators. However, I feel that this location, chosen due to CVSH already owning this land and operating from it, is completely inappropriate, given the nature of the way air moves in our valley.

Further to these personal reason, based on my own views and observations, I also object to the application for the grant of an Environmental Permit for the following reasons.

3) Following the successful Judicial Review which quashed the original Permit issued by the Calderdale Metropolitan Borough Council, a local resident engaged Air Quality Consultants Ltd (AQC) to review the original EP application and associated air quality technical information including the original WYG (now TetraTech) report. The AQC report dated November 2021 was submitted by the Appellant as part of the documents for its appeal.

Reasons set out in the AQC Report...

While no 'Major' issues were found that, individually, were likely to significantly alter the conclusions stated by CVSH within its air quality assessments; there were areas of uncertainty with the applicant's roads modelling verification and assessment of the significance of benzo(a)pyrene emissions that, combined, could affect the conclusions of the assessment and the report concludes that there are valid reasons to suggest that the impacts could be greater than negligible.

Furthermore, the report concludes that additional justification is required on the suitability of the proposed stack height as at present the applicant has failed to demonstrate that the stack height meets the BAT principle.

As the air quality assessment is a supporting document of the permit application, these issues affect the determination of the permit and introduce uncertainty as to whether enough information had been requested by the Council to robustly determine the application.



A number of other 'Moderate' issues were identified, which need to be assessed to determine if individually they would affect the conclusions reached or would do combined with other matters. These include the absence of any Human Health Risk Assessment for Persistent Organic Pollutants. This requires assessment of the total bodily intake of polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (collectively referred to as 'dioxins') and dioxin-like polychlorinated biphenyls (PCBs). There had also been no assessment of impacts on local wildlife sites within 2 km in the applicant's latest air quality assessment addendum.

4) With regard to the Environmental Permit application itself, several areas were identified that introduce uncertainty with respect to the ability of the plant and/or of the Operator to comply in full with the requirements of Chapter IV of the IED. The report concludes that without this information the permit should not have been determined and it therefore follows that any re- determination should only take place after this information has been provided to provide confidence that these requirements can and will be met. These include issues over waste acceptance, the operational envelope and validation of combustion conditions, accidents and incident plans, the lack of a Fire Prevention Plan (the existing plan was not considered valid for a SWIP), measures to contain unauthorised release of polluting substances to land and ground water (such as urea and gas oil storage tanks).

5) Lastly, there are several areas (such as the transport of Air Pollution Control residues through the WTS installation boundary) where it is advised legal opinion is sought before a determination is made.

6) Review by Council and CVSH prior to the failed appeal...

The Council instructed Tetra Tech to undertake a further review of the permit application and the AQC report and the outcome was that additional information was required before a decision was taken. Further information was requested by the Council in relation to the assessment of 1-hour mean NO<sub>2</sub> concentrations, and a sensitivity test regarding uncertainty within the air quality assessments. CVSH refused to provide that information.

CVSH instructed RPS to undertake a review of the AQC report. The RPS report however ignored the items listed in the AQC report (1) Uncertainty (3) Stack Height (5) Road Modelling Verification and Model Adjustment (6) Assessment of 1 hour- mean NO<sub>2</sub> Concentrations (10) Surface Roughness. The reason it did so was only because it followed legal advice from CVSH's lawyers, to the effect that it was considered impermissible to revisit the air quality issues determined by the Planning Inspector during the environmental permitting process.

All these issues remain outstanding, and a permit should not be granted until they are adequately addressed and found

to have satisfactory outcomes.

#### 7) Law and Guidance, in regards to stack height...

I believe the operation of the CVSH SWIP is covered by the Industrial Emissions Directive ('IED'). Article 46(1) within Chapter IV of IED requires that: "Waste gases from waste incineration plants and waste co-incineration plants shall be discharged in a controlled way by means of a stack the height of which is calculated in such a way as to safeguard human health and the environment."

Under the EPR, it is the local authority permitting function that is responsible for determining whether the height of a stack serving a SWIP is sufficient to safeguard human health and the environment. To reach a conclusion concerning the acceptability of the proposed stack height, the permitting authority is required to consider the predicted air quality impacts for that stack height. Hence, it has to be satisfied that such an assessment, including its underlying methodology, is robust before determining whether a permit can be granted.

In everything I have seen to date, there is no evidence that Calderdale has made its own assessment of the appropriate stack height, but has taken CVSHs modelling and calculations in support of their existing 12m stack and deemed them to be accurate.

#### 8) Defra guidance re permitting SWIPs...

In Defra's Environmental Permitting: Core Guidance, reference is made to the Environment Agency's Guidance for developments requiring planning permission and environmental permits.

Within the Environment Agency's guidance, it is stated:

"Local planning authorities are responsible for determining planning applications... When deciding on a planning application, planning authorities should:

- Be confident the development will not result in unacceptable risks from pollution when considering if the development is an appropriate use of the land.
- Not focus on controlling pollution where it can be controlled by other pollution regulations, such as EPR."

Consequently, local authorities responsible for determining applications at planning stage are required to consider

whether the proposed development represents an appropriate use of the land, not consider controlling pollution from regulated activities covered under the EPR. Detailed assessment of operational stack emissions with respect to controlling emissions under the EPR is the primary responsibility for the permitting regime, not planning. This is further clarified in the Environment Agency's Draft EPR Permit – Stack Height Assessment guidance:

“The detailed assessment of impact of emissions from the installation is carried out under permitting, not planning. So while a stack height may have been set under planning, it does not necessarily mean the planning authority would not accept a different stack height, or that we are bound to conclude that the height is acceptable just because it is specified in the planning and the ES will not be breached.”

Paragraph 188 of the National Planning Policy Framework states:

“The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.”

Whilst the NPPF states planning issues should not be revisited through the permitting regimes, it is clear from the statutory responsibility imposed on permitting authorities through the EPR that this should be restricted to aspects of the air quality assessment that determine whether the proposed development represents an acceptable use of the land, not pollution control aspects. This would include, for example, not revisiting aspects related to construction phase assessments.

However, it is the permitting authority that has the responsibility and statutory obligation to determine whether operational stack emissions from regulated facilities covered under the EPR are controlled to prevent significant impacts on human health and the environment. Combined with ensuring statutory minimum emission limit values can be met, predictive air quality assessments are the only data available to the permitting authority at application stage to determine the potential impact on human health and the environment and, consequently, the degree to which emissions are/can be controlled.

Irrespective of whether operational air quality effects have been discussed at planning stage, the local authority

permitting function, as regulator for SWIPs, can, and must, ensure that operational phase assessments of stack emissions are robust. If any aspect of the air quality assessment of operational stack emissions is not considered to be robust, further information should be sought by the local authority permitting function, and provided by the applicant, before determining the application.

Many thanks..

XXXXX

606	<p>I wish to object to the application by Calder Valley Skip Hire for a incinerator in Sowerby Bridge.</p> <p>Sowerby Bridge is already suffering from pollution and this should not go ahead in the interests of the health of the community.</p> <p>XXXXX</p> <p>Sent from my iPad</p>
607	<p>Dear MBC Environmental Health,</p> <p>Please accept this email as an objection to the Calderdale Plannnig S13/006 Sowerby Bridge Incinerator. I object on the grounds of the air health of the area; there is a primary school nearby and my daughter attends the nursery just down the road. There is also a concern about the wildlife of the nearby woodland: bats, deer, foxes etc.</p> <p>Best wishes,</p> <p>XXXXX</p>
608	<p>Dear Environmental Health team,</p> <p>Please accept this email as an objection to the Sowerby Bridge incinerator proposal. I object on the grounds of air quality. This area has a higher than average rate of respiratory illnesses than the national average.</p> <p>Kind regards,</p> <p>XXXXX</p>

609

I'm writing to object to council giving permission for a permit to operate a waste incinerator on Rochdale road Sowerby Bridge.

My reasons are height of the trees and their closeness to the smoke stack making the control of gases released would be unsafe for both peoples health and the environment.

The amount of pollution in Sowerby Bridge is already considerable mist smoke lie in the valley on a regular basis I have seen this increase greatly over the years when walking my dog daily above the valley.

There should be access to site diaries and inspection records at anytime when required.

My husband has COPD just walking along wharf street visiting the doctor shopping in Sowerby Bridge already affects his breathing and his health adding even more pollution would make the residents already poor air quality even more unmanageable, with all the schools in the area we are inflicting their young bodies to future damage.

As for transportation to and from the cite Rochdale road and Sowerby Bridge have high levels of traffic that can become over congested every day adding to this not is not acceptable and when the motorway is closed or has delays the area is clogged up depending on how the waste is being transported any sub standard vehicles can leave spillages which will have to be cleaned up at a large cost to calderdale not the owners of the incinerator.

The right to clean breathable air peoples health and safety and extra costs too the council far out way any need for a permit, a company should not be able to make profit from Calderdale people suffering residents should not be expected to pay for the council cleaning up spills.

Yours XXXXX

Sent from my iPad"

610

Application for an Environmental Permit for a Small Waste Incineration Plant at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge, West Yorkshire, HX6 3LL Reference: S13/006

From XXXXX

I wish to object to the application for an Environmental Permit.

1. Calder Valley Skip Hire has not appealed the decision. In their permit application, Calder Valley Skip Hire makes reference to their previous identical permit application. This submission is not a fresh application; it is a resubmission of application report dated 5 August 2020 submitted by RPS on behalf of CVSH that was refused at appeal on 5th July 2023 by John Woolcock on behalf of the Secretary of State. He concludes "I am unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment." Guidance on the Appeal Procedure clearly states in 4.5. 4.5.1. The decision on your appeal is final. After it has been issued, neither the Secretary of State, nor the Inspector can consider further representations or make any comments on the merits or otherwise of the case. 4.5.2. The decision can only be challenged in the courts by judicial review. If the appeal is quashed following the proceedings before any court, the main parties will be notified and asked to provide any further representations within 28 days. The Secretary of State may then ask for a hearing to be held or re-opened and the appeal will be redetermined. An application to seek permission for judicial review should be made to the Administrative Court of the High Court of Justice. This should be done quickly and in any case not longer than 3 months after the date of the decision. Calder Valley Skip Hire has not appealed the decision.

2. Impartiality The closing statement on behalf of Calderdale Council on the 31st May 2023 at the appeal hearing said: 1 .16 There is no proper basis to conclude that the proposed incinerator cannot be operated in a manner consistent with the EPR 2.17 The detail of the conditions that would be appropriate to be imposed on the Permit have been addressed fully in the Hearing. They provide a robust suite of conditions to control the activities and are consistent with the EPR, WFD and IED. XXXXX for Calderdale Council 31st May 2023. As Calderdale Council supported Calder Valley Skip Hire in the recent appeal, how can the decision making process be seen to be fair and impartial from the perspective of an external observer. If Calderdale Council has predetermined their position, they should withdraw from being a member of the decision making body for that matter and pass the decision to an impartial inspector. John Woolcock said in his report "Similarly, as the deemed refusal will stand it is not necessary for me to rule on the technical objections raised by third parties" The following issues are still outstanding.

3. The site is at high risk of surface water flooding as outlined in the applicants risk assessment and the Environment Agency flood risk assessment. Flood risks have not being properly identified or addressed. The following statements are from RPS's Flood Risk Report 15th December 2016 HYDROLOGY\_AND\_FLOOD\_RISK-3BL.pdf "The EA's surface water flood map shows that the existing building has a low to medium risk of flooding from this source" (Page 2 ) "It is also noted that the Applicant has confirmed that the building did not flood during the extreme event in December 2015 "

(Page 3) Both of these statements are contradicted by the attached Environment Agency information. Evidence 1 - attached - Current Flood Risk attached. Surface water flooding for Calder Valley Skip Hire HX6 3LL is High Risk  
Evidence 2 - attached - The map and data showing where historic flood events impacted the area in 2015 25th December 2015 – 29th December 2015 – Source of flood: Main River Channel Capacity exceeded – Affects location (HX6 3LL) Yes Evidence 3 - attached – Environment Agency Historic flooding affects site. Evidence 4 - attached Site Drainage Plan CV17 No reference to the gully running through the site as shown in photograph. Incorrect post code HX6 3BL is on this plan, which has a low risk of flooding. The correct postcode is HX6 3LL which has a high risk of flooding.  
Evidence 5 - attached – Calder Valley Skip Hire Environmental Management System for SWIP Table 1 SWIP Risk Assessment Risk assessment for the River Calder is mentioned but no risk assessment for the River Ryburn 1.22 Hazard – Flooding - Likelihood Score 5 (high)- Fairly probable

4. Adverse effects on local population can only increase with more pollution from the incinerator especially when the site is only 670 metres from an Air Quality Management Area. Hazardous air pollutants are known to have adverse effects on urban populations exposed at the micro scale, and, for example, are believed to play a significant role in the rapid increase in urban asthma (Corburn, 2007, Delfino, 2002, Leikauf et al., 1995, Weisel, 2002). In Calderdale an estimated 2.1% of the population has COPD and 6.6% have asthma. This equates to 4,575 with COPD and 14,421 with asthma. Both these figures are significantly higher than for England. The prevalence of COPD has increased steadily since 2005/6 when it was 1.5% and asthma has increased from 5.5%. The premature mortality rate from respiratory conditions is higher in Calderdale than the England rate. The under 75 respiratory conditions mortality rate in Calderdale is 40.4 deaths per 100,000 (Directly standardised rate (DSR)) compared to 28.1 in England. All data is taken from Public Health England

5. Limitations associated of ADMS software. Accurate meteorological data is crucial for dispersion modeling. There are limitations associated with ADMS simulations, including the inability to predict plume dispersal with 100% accuracy. As with any modeling system, it's essential to validate the results against real-world measurements and consider site-specific factors. Inspector John Woolcock said: "Given the height and proximity of the trees/woodland in the vicinity of the proposed stack, I am not convinced that it would be reasonable to rely solely on surface roughness length to properly take into account the likely effect of the trees on the dispersion of emissions from the SWIP. In the circumstances, I am unable to find that waste gases from the SWIP would be discharged in a controlled way by means of a stack the height of which is calculated in such a way as to safeguard human health and the environment." ADMS does not include specific provision to model the effects of individual trees or woodland on the plume also the software may not be reliable close to isolated slopes with higher gradients or if large parts of the modeling domain have slopes greater than 1:2. Weather conditions can vary significantly over short distances. Data from 19 miles away may not fully capture local effects. Evidence 6 - attached Met Office email enquiry Reply from XXXXX Met Office I have been speaking this through



with a senior data scientist and he has said, Unfortunately that is exactly the kind of application we cannot support. That (HX6 3LL) is a very narrow, deep valley (~500m wide) that simply will not be resolved by our analyses or NWP (2km). We could not meaningfully assess conditions within that valley. Meteorological convention would suggest that valley would be prone to inversions/cold air pooling. ADMS has also been the subject of investigation for academics such as “The importance of meteorological data for modelling air pollution using ADMS-Urban” “In the case of individual episodes however, it does appear that even relatively small errors in wind speed, wind direction and cloud cover do have a noticeable impact on the model output. Importantly, this impact on model output is particularly noticeable on occasions when air pollution levels are likely to be highest. In the worst case, the differences between the local cloud amount and wind speed as compared to the more distant data from a synoptic station, may all be forcing an overestimate (or underestimate) in the model output” As at nearly all locations in the UK there is a noticeable distance between the urban areas of interest to local authorities concerned with air quality management and the synoptic meteorological stations. This therefore presents a challenge to local authorities if they wish to use the model for individual events rather than for long term averages. If UK local authorities are to make increasing use of air pollution models, particularly for assessing individual events, they will need to address the problem of the representativeness of the meteorological data they are using. “

611 To whomever it may concern,

I am a resident of Sowerby Bridge and live very close to the proposed sight of the incinerator at Calder Valley Valley Skip Hire, and would like to register my opposition to this project in the strongest possible terms.

This application has already been refused on 5th July 2023 by a government planning inspector. The grounds for this refusal have not changed.

The proposed sight sits deep in a valley and is surrounded by trees and woodland. Smoke and mist regularly sit in the bottom of the valley and inversion can stop waste gases dispersing. Not to mention the smell and ash which will also linger. This means, for the people who live here, and the flora and fauna which are in abundance in this area will be forced to breath polluted air. My understanding was that breathing clean air is a basic right of any community. I am surprised that Calderdale Council, who I believed to be more forward thinking in looking after our environment, has allowed this application to get this far.

Further concerns are raised around the safety and monitoring of this sight. I have seen nothing to make me feel at ease that this will comply with the safety regulations in place and that this will be monitored in any way.

I am sure you can understand my grave concerns around this venture and I hope you will take into account my most strong opposition to this application.

Thank you for your time XXXXX

612	<p>Hi</p> <p>§ Reference: S13/006. § Address: XXXXX</p> <p>I would like to object to the above application for an incinerator being located on the site. The site sits very low in the valley which will lead to smoke and fumes struggling to disperse in certain weather conditions. This will lead to potentially toxic atmosphere for both local wildlife and residents.</p> <p>Kind Regards</p> <p>XXXXX</p>
613	<p>Hi:</p> <p>Please register my strong objection to the latest application by Calder Valley Skip Hire vis-a-vis a possible incinerator at Belmont.</p> <p>Planning to operate an Incinerator of this nature close to a centre of population is a terrible idea.</p> <p>Yours etc,</p> <p>XXXXX</p>
614	<p>Dear Sir/Madam</p> <p>I write to object to the application S13/006 by Calder Valley Skip Hire, to build a waste incineration plant at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.</p> <p>I fully appreciate that waste disposal facilities are necessary. My objection is not based on 'not in my back yard', it is based on the fundamental unsuitability of the site.</p> <p>A narrow, deep valley does not allow for essential dispersal of fumes - retention and concentration is a more likely outcome in a residential area that already experiences pollution.</p> <p>As we have discovered in recent years - the impact of climate change will only worsen the situation - the area is at proven risk of flooding. And since wind monitoring is difficult along the valley, and temperature inversions are common, the risk of site failure is significant.</p> <p>Calder Valley Skip Hire is a valued company in the area, but their suitability to manage such a complex site is unproven, and thereby exacerbates the risk.</p>

The application has failed before and I doubt that circumstances have changed sufficiently to make the previous refusal valid.

Thank you for considering my objection.

Yours faithfully

XXXXX

615      Good afternoon

I am a resident in sowerby bridge and i am writing to object to the proposed incinerator for waste on Rochdale Road.

Please counccept this this email as my objection to the proposed incinerator

A government inspection has already suggested this is a bad idea! The measurable pollution in our valley is already high due to the congested roads (always standing queues of traffic) and because of it's topography which traps pollution in the bowl of the valley.

The Council have abdicated responsibility for the decision, therefore are putting it in the hands of Council 'Officials', who aren't experts in any way.

Kind regards

XXXXX

616 31 March 2024

Objection to planning permission for a Schedule 13 waste incinerator plant in the Ryburn Valley  
Ref : S13/006

To whom it may concern

As a resident of the Ryburn Valley, I wish to make an official objection to the proposal to build a waste incinerator near Sowerby Bridge in the Ryburn Valley. This is for a number of reasons :

- \* the site is totally unsuitable for burning waste as it is located in a steep-sided, wooded, residential valley that already suffers from high pollution levels
- \* the site is at risk from flooding
- \* there has been insufficient site specific modelling for a site where temperature inversions are common and the wind direction in the valley is complex to predict
- \* there are doubts about the competence of the CVSH to run an incinerator

Furthermore, a group of residents in the Ryburn valley were sent information from the Met Office last week stating that: ""This is the kind of application we could not support as we could not meaningfully assess conditions within that narrow deep valley which would be prone to inversions/cold air pooling"".

This reply from the Met Office is clearly very strong evidence that there should not be an incinerator on that site.

Kind regards

XXXXX

- 617 I wish to object to the latest proposal for an environmental permit .this application is a resubmission of an application dated 5th August 2023 ..this was refused at appeal on the 5thJuly 2023 by Government planning officer John Woolcock . The government inspector said that given the height and proximity of the smoke stack to trees and woodland he was unable to find that waste gases from the incinerator would be discharged in a controlled way as to safe guard human health and the environment . This decision is very clear and officers should refuse the current application ...nothing has material changed.  
..Sowerby bridge is already suffering air pollution it is an air quality management area ..with various schools/ nurseries in the nearby area..the CVSH proposal will only increase the problem ...
- The councils plans for zero emissions by 2038 will lose any credibility if the incinerator permit is given ...  
No inspection of records by Calderdale council staff is included in proposal ...this sends alarm bells is there anything to hide ...this is worrying as very careful and time consuming supervision would and should be required for a proposal that would cause health and safety and environmental damage  
With pressures on the NHS can we afford ..projects that impact on the health of the local community ..answer No .  
Hence I object to the Environmental permit and ask that as officers looking after the best interest of Calderdale as a whole not one particular firm ...the permit is rejected .  
Thank you XXXXX
- 618 Sent from my iPhone  
I wish to object to this application i have family living very close to this area i am worried and can't believe that this has even been considered being so close to schools etc with all the harmful gasses and dust that will be released into the atmosphere and causing a major threat to peoples health and the climate.  
XXXXX

619 Hi there,

I am writing this email in objection to the proposed plans for a waste incineration site to be built in Ryburn Valley as per the ref: S13/006.

As a local living in Triangle who would be very close to the proposed site, I have a number of concerns for those of us living in Ryburn Valley. Please see my concerns below:

#### Risk to Human Health

- There is an unknown impact on human health in regards to the material they propose to burn at the incineration site, no matter the scale of what they're burning. We know that burning many materials, even wood, is linked to an increase in cancers, especially lung cancer (but also, hepatic and biliary tract cancers), and the development of fibrosing lung disorders/interstitial lung disease (which in itself, is a fatal diagnosis).
- The area in which the proposed site is situated, is full of surrounding houses all the way up Rochdale road, in which fumes will sit at a low level - there is also frequently low-lying cloud/inversions in this area (see: Triangle cricket pitch most mornings has its own inversions across the pitch stretching down through the valley towards the proposed site). This means that on some days, the fumes are going to be still and sat within the valley, with everyone living and visiting this area subject to an increased risk of cancers.
- All risk to human life has been calculated based on estimates and projections for this case being put forward, and when talking about the risk to human life in a densely populated area, with something we know increases cancer risk; estimation isn't enough - the risk will be SIGNIFICANT.

#### Lack of Air Quality

- Mostly this follows on from the last point, but air quality in itself is an issue when it comes to the environment and the planet. There is already an air quality issue in Sowerby Bridge/Triangle/Kebroyd/Ripponden; adding to this issue by burning tonnes of rubbish per year, is only going to make the problem worse.
- There is a lesser amount of wind through the bottom of Ryburn Valley, and having lived in the very bottom of Triangle (down by the river), anecdotally speaking, there is a hugely reduced windspeed compared to higher up in the valley - more than anything the fumes are going to pool in this basin and the residents here are going to be subject to vile toxins which are going to strip them of their health.

#### Noise

- The plant is expected to run 24 hours per day - not only churning out toxins for us all to inhale, but noise to send residents in the local area into delirium from an inability to sleep. There are already noise issues from the mills by the site proposal, and with this added extra, it is going to be a very noisy plant. This would be acceptable in an area with a lesser population, but the entire valley will act as a reverberation tunnel for sounds to echo through and keep more residents from sleeping.

#### Nature

- Naturally, the more sound being made, the more disruption to local wildlife, including both small and large mammals (deer + badgers) and avian wildlife - there are protected species of bird down in Triangle, including a huge population of Herons, but also Woodpeckers, Cuckoos, Tawny Owls, Buzzards... In a natural crisis like we're facing today, where does churning out toxins and 24-hour noise into beautiful local woods and fields, fit in with this area?
- Nowhere in any report can I find evidence of the effect of hot gases on the surrounding tree populations, of which there are thousands and in between this, ancient woodland. The environment WILL be harmed, I have no doubt in that, but there seems to be no addressing of the affect this will have on local wildlife. The stack height of their chimney is inadequate and thus, harmful toxins cannot be removed high enough into the atmosphere to not cause issues with the Ryburn Valley residents and treasured wildlife.

#### Further Consideration

- Ryburn Valley High School, Triangle Primary School, Mill Bank Primary School, Ripponden Primary School - all schools within the firing line of the toxic gases which are going to be produced from the incineration site, putting all these children with developing bodies and immune systems in harm's way - increasing their risk of cancers and lung disease across the lifespan. They don't get a fair start in life, owing to the exposure of something they can't avoid.
- Triangle cricket club - annually play matches from April through to September, these guys will be in the direct firing line of this chimney, running around a pitch with increased respiratory demand, absorbing toxins every weekend and during training in the week. This is also a place for children to gather and enjoy, and there are regularly events taking place here, including Rushbearing festival.

I wholeheartedly hope that this development does not take place - it will be such a huge loss for the area, and the permit for this company should be refused.

XXXXX



620 Calder Valley Skip Hire SWIP application - Objection x 2

Ref S13/006

Objections are on the basis -

- the site is very unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution. The effect on human health will undoubtedly be high, as well as a negative effect on surrounding wildlife
- the site is at risk from flooding
- insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict
- I have very little faith in the competence and trustworthy nature of CVSH to run an incinerator.

THE PERMIT SHOULD BE REFUSED.

Signed,  
XXXXX

621

I find it unbelievable that this re-application has been allowed given the Inspectorate have previously refused it. Despite that and the fact that the applicants are using the Easter holiday period to try and minimise the time the public affected have to object – AGAIN – I hope you will note my very strong objection as follows:

Issues of concern:

1. Unknown impact on human health : harmful emissions

The modelling of air pollution does not satisfactorily represent the conditions in the valley even with rough surface calculations. The stack height is low, the point of emission is near level with the houses on Rochdale Road and the mixing of air / dilution of pollution at the point of emission is unknown. There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on one particular model which does not allow for the topography, the woodland, the inversions in this valley. Each report for air quality, uses terms like, estimates, projected, calculated based on a model of air distribution at Leeds Bradford airport. Some parameters have been set with the agreement of CVSH which is inappropriate. The valley suffers from inversions which will keep the pollution in the air that we breathe at low levels. The stack height should be much higher in this location. Is it really acceptable to allow a risk to human health levels of dioxins and furans are predicted to be higher in the area and yet these are only estimates. On this basis alone the permit should be refused. The flue is not high enough to achieve dilution - the risk to human health has not been adequately determined and the effect on human health will be SIGNIFICANT. The Met office have recently replied to this on the question of this modelling: "Reply from XXXXX, Met Office "Apologies for the delay here but I have been speaking this through with a senior data scientist and he has said the below: Unfortunately that is exactly the kind of application we cannot support. That is a very narrow, deep valley (~500m wide) that simply will not be resolved by our analyses or NWP (2km). We could not meaningfully assess conditions within that valley. Meteorological convention would suggest that valley would be prone to inversions/cold air pooling."

2. Air quality

The addition of this significant amount of emissions to atmosphere will impact on air quality within the boundary. The data provided by the applicant shows much higher pollution levels at Spring hill mills area, this is due to prevailing wind conditions. Pollutants when they are able to disperse in the winter months will likely blow into the AQMA having a seriously detrimental impact on air quality within the AQMA and surrounding areas. The original submission suggested that there won't be an increase in waste transfer in or out of site. This is incredulous. A business will operate to achieve maximum profit. It is profitable now bringing in waste sorting and moving waste to landfill. This operation will continue and the site will take in more waste to burn - numbers of vehicles to site will likely double if not triple. In addition, the smell and offal frequently left on the roads around Boothtown are testament on how this group are bad neighbours with no thought for the affect on those around them. The effect on the AQMA will be SIGNIFICANT.

### 3. Noise

The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door will be open for much of the time impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that.

### 4. Flora and Fauna

Much has been made of the trees which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact of hot gases on these trees, how these harmful chemicals will affect the local ecology? Deer roam the woods, badgers, cuckoos, the woods are alive with birds and animals, how is nature to be protected? The flue is not high enough to allow gases to escape and the environment will be harmed.

### 5. Enforcement

CMBC have insufficient resources to ensure adequate enforcement a severe lack of specialists to deal with such a site, and there is also an apathy towards enforcement. The Authority has already been threatened with litigation by CVSH. REFUSAL ON THE GROUNDS: Inadequate dispersal and dilution of chemicals which are harmful to human health.

\*The Stack height is inadequate

\*Dilution is negatively affected by the location of the of the plant in the valley bottom

\*Dispersal is negatively affected by the location of the emission point of the flue

\*Dispersal is negatively affected by the trees

\*Dispersal is negatively affected by inversions

\*Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology.

THE PERMIT SHOULD BE REFUSED

622

30th April 2024

To whom it may concern

I, XXXXX of XXXXX, object to the latest Calder Valley Skip Hire Permit Application for a Small Waste Incinerator Plant (SWIP) in Sowerby Bridge ref. S13/006 for the following reasons:

1. An original SWIP Permit application (APP/EPR/603) was turned down in 2018 on the basis of insufficient evidence to guarantee air quality for residents and surrounding businesses, in that it could not be guaranteed that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.
2. A virtually identical Permit application of August 5th 2020 SWIP was refused at appeal on the 5th July 2023 by Government Planning Inspector John Woolcock. The Government Planning Inspector refused a permit stating he was “unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”
3. The virtually identical Permit application of August 5th 2020 SWIP (refused at appeal) totally relied 100% on an ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools.
4. The current new application ref. S13/006 of Feb 20th 2024 relies totally 100% on the same ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools.
5. The current new application ref. S13/006 of Feb 20th 2024 has the same height and size of waste gas exhaust discharge stack and appears to be a resubmission of the application dated Aug 5th 2020 but with added information stated as an ‘independent review’ by RPS on behalf of CVSH. The independent review was done by CERC (Cambridge Environmental Research Consultants) to verify the treatment of trees within the air quality assessment by RPS. The review should not be taken into consideration and the permit application should be refused as it does not contain an “independent” review. CERC are the producers of the ADMS air modelling software that RPS used for this application. CERC have a vested interest in not showing up problems with their software or upsetting their customers (CVSH). The CERC report should be disregarded as unreliable in that it stated that ‘the approach adopted within the air dispersion modelling is considered appropriate and there are no other suitable models/software available’; when this is

not the case and other suitable models/software are available.

6. The effect of the specific weather condition of inversion in a valley bottom as compared to the weather data used for from a hill top, has not been taken into account on the ADMS computer model data when it would be crucial to the report figures on the flow and dispersion of waste gases relating to any application for a small waste incinerator environmental permit in the valley bottom of Sowerby Bridge. Inversion being deviation from the normal change of an atmospheric property in comparing the flow and dispersion of waste gases from a low valley bottom in close proximity trees and buildings, with the high altitude of an open hill top site as per weather data used for the permit application submitted. As the application for the Permit relies 100% on the computer model, the permit application should once again be refused as being incorrectly assumptive and as such inaccurate in not taking into account the site being located in a valley with a history of detrimental inversion. As such the ADMS computer model data as submitted is unsafe in its attempt to guarantee safeguarding of human health and the environment.

7. The proposed Incinerator site and waste exhaust fume plume smoke stack is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2) and is identified as subject to a Council and local Environmental Health initiative to improve the air quality. The permit should be refused given the historic evidence of smoke and low cloud hanging in the valley bottom due to the unique terrain which is the exact opposite of the computer model figures from Yeadon Airport, the waste exhaust fumes from the proposed smoke stack would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

8. As the proposed Incinerator site is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2), the additional travel to and from the site through Sowerby Bridge of extra diesel fuelled waggons transporting 2 tonnes per hour (Monday to Friday for 52 weeks per year) and then re-transporting away the non-combustible waste to landfill; would in the first instance further add to the already damaging traffic congestion and in the second instance damage even further the air quality of Management Area, (AQMA2) The permit should be refused as the extra traffic throughput, poisonous exhaust fumes and congestion would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

9. With regard to monitoring; the August 2020 CVSH permit application states "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time." The January 2024 application by CVSH should be refused as CVSH have removed the statement "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time." The Permit should also be refused as there would be a restriction if not an impossibility for CMBC to continuously monitor emissions to air in order to confirm that levels are within IED emission limits, given the removal of the power of CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time.

As such the permit application does not fulfil its obligation in guaranteeing that necessary measures will be taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

10. The new application report dated 26 Jan 2024 submitted by RPS on behalf of CVSH states that the refusal at appeal decision by Government Inspector John Woolcock is "perverse" and "procedurally unfair" but yet did not take up their option to take it to Judicial Review.

The permit application should be refused as it appears both perverse and procedurally unfair of CVSH in submitting what they state is basically the same application as in 1.5.5 in the new application report.

The permit application should furthermore be refused as it appears to be abuse of process by CVSH in not taking their option to take the original appeal decision to Judicial Review, but alternatively submitting what CVSH state is basically the same application on 20th Feb 2024 as was refused some 7months later on 5th July 2023 by Government Inspector John Woolcock.

Yours Sincerely  
XXXXX

623 I would like to register my objection to above

I agree with below email

Many thanks  
XXXXX

Sent from Outlook for Android

Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,

XXXXX



624 Ref- S13/006

The fact this is still trying to go ahead is mind boggling three off the main reasons to not wanting the incinerator are as follows 1- Air pollution they will be significant amounts of emissions put into the atmosphere which will affect the surrounding areas 2- Impact on human health which will be unknown but why take the risk or ask members of the public in the surrounding areas to do so 3- Noise in which they are wanting the incinerator to be working 24 hours a day will affect many in the area why should we have to put up with it. The proposal for this permit should be refused immediately

625 I wish to register my objection to the Calder Valley Skip Hire application for an environmental permit to operate an incinerator close to my home in Sowerby Bridge.

I have spent the last 27 years running a business in Dean Clough Halifax creating visualisations and simulations for clients such as HSE (Health and Safety Executive) Newcastle Race Course, Channel 4 Media and countless architectural practices. I am currently a Visualisation Specialist with a large international company.

I wish to highlight that the effects of the pollution cloud from this incinerator have not been accurately modelled within their submission and are hence not valid.

It has been well understood by the architectural and environmental industries for at least the last 15 years, that accurate simulation of the effect of wind and weather on such installations can be carried out through site modelling. This is done for both natural and built environments such as city centre building developments and forest fire simulations. A topographical model including the valley sides, trees, the river and buildings is required accurately to predict how the incinerator emissions will react.

We are informed that only data from an unrelated distant area has been submitted. I suspect that the reason for this is that the effect of releasing pollution from an incinerator in our deep wooded valley would be very different to the data submitted.

I object to the granting of an Environmental permit to this company on the grounds that the effects of the emissions from this incinerator remain unknown and are potentially hazardous to human health.

XXXXX

626	<p>Dear Sir.</p> <p>As a local resident I wish to object in the strongest possible terms once again to Calder Valley Skip Hire's application to operate a waste incinerator on Rochdale Road, Sowerby Bridge.</p> <ul style="list-style-type: none"> <li>• Firstly, Sowerby Bridge already suffers very poor air quality, indeed it is in an air quality management area such is the current pollution levels, therefore how on earth will operating a waste incineration site ½ mile up the road (and upwind) help in this case??</li> <li>• Secondly, the height and proximity of the proposed smoke stack of the plant to the nearby trees &amp; woodland mean that waste gases from the incinerator could not be discharged in a controlled manner which would safeguard human health &amp; the environment.</li> <li>• Thirdly, on a regular basis throughout the year mist &amp; fog &amp; smoke lie in the valley bottom throughout the year and inversion would surely stop waste gases from the incineration plant dispersing as is often seen after any fire in the valley. Such inversions are a common phenomena in our valley, so there must be better sights for a waste plant in other areas where such inversions don't occur.</li> <li>• Lastly, Calder Valley Skip Hire needs to understand that this application has to be the last and that no further applications will be allowed.</li> </ul> <p>Yours Faithfully, XXXXX</p>
627	<p>We strongly object to the proposal of a waste Incinerator in Sowerby Bridge.</p> <p>The town is already suffering poor air quality, it is low in the valley and on the occasion of a fire on the site there was a terrible stink on the whole of the area.</p> <p>We are at the older end of the population but have witnessed the smogs of the industrial era. The pollution from the incinerator may not be so visible but may be doing much damage. The young people of today and the Community of Sowerby Bridge should have a basic right to clean air.</p> <p>Regards XXXXX and XXXXX XXXXX</p>
628	<p>"I wish to object to Calder Valley Skiphire's application to build an incinerator in the Triangle area of Halifax. I cannot believe that in this day and age when everyone is striving for clean air this application is even being considered. This incinerator would be a serious health risk to children at the local school, wildlife and residents.</p> <p>XXXXX</p>

629 "I and my family wish to protest against the planned Incinerator on the grounds of air pollution. The impact on human health is also a worrying factor coupled with the noise of operations which is bound to effect residents one of which is my daughter and her husband.

Please do not allow this scheme to blight our beautiful valley.

XXXXX

630 Hello,

I would like to register my objection to the proposed incinerator at Belmont, Sowerby Bridge. The range of opposition to it seems to come from very far and wide, across political spectrums, and to be founded on valid scientific concerns about how fumes from incinerated waste will be trapped within the valley. Those in favour are never able to explain why in any detail. It seems to me that at least if the proposal is rejected the company concerned will have to go ""back to the drawing board"" and come up with a more ecologically sound option, or that the plans for an incinerator will be dropped altogether. The alternative would be to go ahead on the terms of the current proposals, which as I say do not seem to stand up scientifically.

Many thanks,

XXXXX

631 Calder Valley Skip Hire SWIP application - Objection.

Ref S13/006

Schedule 13 small waste incineration plant ref

S13/006

Dear sir/ madam,

I am writing to object to the planned incinerator for the following reasons:

The site is located on a greenbelt with a variety of species habiting the surrounding woodland. The applicant cannot know that or the impact the proposed development will not impact on a) Protected and priority species and b) Designated sites, important habitats or other biodiversity features.

The site deals with waste from a number of sources, and sometimes it cannot be known by the CVSH company prior to transferring waste to the site that the waste being delivered does not or has not in the past contained contaminants. There should be an independent assessment that the land is not contaminated or will not become contaminated.

CVSH company does not monitor waste prior to arriving on site and so cannot guarantee that the waste arriving on site will not be hazardous.

Environmental assessments submitted by CVSH are based on many assumptions that do not factor in the unique qualities of this specific site. The issue is that computer models are only as accurate as the data that is fed into them. Slight variations in the input data can have a significant effect on the results.

The number of assumptions within the report need validating by an independent consultant who has not been commissioned by the applicant.

Of particular concern are the following assumptions from the environment report titled: Proposed Waste Recovery Plant, Rochdale Road, Sowerby Bridge Air Quality Assessment

3.7 It is anticipated that the process will not result in significant emissions of polychlorinated biphenyls (PCBs) or polycyclic aromatic hydrocarbons (PAHs), however emission limits of 0.005 mg/Nm<sup>3</sup> and 0.001 mg/Nm<sup>3</sup> respectively, have been assumed based on measurements at European waste incineration facilities as specified in the IPPC

Reference Document on BAT for Waste Incineration.

4.6 At receptors in close proximity to Rochdale Road (receptors 1,5,8 and 16 in Figure 3.1), existing baseline concentrations are likely to be somewhat higher due to emissions from road traffic. For the purposes of the assessment, the baseline NO<sub>2</sub> concentration at receptors 1,5 and 16, which are not within the AQMA, is assumed to be similar to that measured at Wakefield Road (less than 90% of the AQO). At receptor 8 (the boundary of the AQMA) the existing baseline is assumed to be over 95% of the AQO.

4.9 The CO, SO<sub>2</sub> and benzene mapped concentrations are based on 2001 monitoring data. For CO, factors are available to project the concentrations to future years<sup>18</sup>. The 2015 SO<sub>2</sub> concentrations are assumed to be 75% of the 2001 estimates, in accordance with the 2003 Local Air Quality Management Technical Guidance<sup>19</sup>. The 2001 mapping includes projected benzene concentrations for 2010 and these are assumed to be representative of 2015 concentrations for the purposes of the assessment.

4.10 A summary of the annual mean 2015 background concentrations assumed for the assessment is presented in Table 4.2. The concentrations were derived from contour plots of the mapped concentrations to determine the maximum at sensitive receptor locations.

4.12 Ambient monitoring of Hydrogen Chloride is carried out as part of the Defra Nitric Acid Network at a number of locations around the UK. The closest monitoring site to the proposed facility is at Ladybower in the Peak District, which is around 40 km to the southwest. The average annual mean HCl concentration measured at this location between 2010 and 2012 was 0.31 µg/m<sup>3</sup>. This concentration is assumed to provide a reasonable estimate of the background concentration of HCl at the proposed facility.

4.18 For the purposes of the assessment, the UK average rural concentrations are assumed to be reasonably representative of the baseline trace metal concentrations at the Site.

4.22 For the purposes of the assessment, the average concentration measured at the rural background sites between 2008 and 2010 of 8.0 fg/m<sup>3</sup> is assumed to provide a reasonable estimate of the baseline dioxin and furan concentration at the proposed facility.

4.24 The average urban and rural background concentrations measured in the UK between 2010 and 2012 were 0.33

ng/m<sup>3</sup> and 0.062 respectively. 4.25 The average rural background concentration is assumed to provide a reasonable estimate of the background concentration in the vicinity of the Site.

4.26 Monitoring of PCBs is currently carried out by DEFRA at six locations in the UK as part of the TOMP's Network. The average PCB concentration measured at the rural background monitoring sites (Hazelrigg, Auchencorth, Weybourne and High Muffles) from 2008 to 2010 is 0.000044 µg/m<sup>3</sup> and is assumed to be reasonably representative of the baseline PCB concentration at the Site and nearby sensitive receptors.

4.27 A summary of the annual mean and short-term background concentrations assumed for the assessment is presented in Table 4.7.

5.34 The Step 1 screening has assumed that the background concentration is equal to the average measured at urban sites for each pollutant. The predicted and background concentrations are apportioned 80% Cr (III): 20% Cr(VI)

Due to the fact that the future health of a local population is resting on the validity of these computer modelled environmental assessments the local council and planning authority have a duty of care to the people of Sowerby Bridge and Halifax to ensure that the input data used for these reports are robust.

The report does not consider the variability of ash which could make a small proportion of ash much more toxic than the average.

The report does not acknowledge that human consumption of dioxins (mainly from food) is already above the government's 'tolerable daily intake' for a third of the population so any extra dioxins from any source should be considered significant. A precautionary approach would be to allow no further increases in exposure until levels for all the population are well below "tolerable levels"

The report does not acknowledge that human consumption of dioxins (mainly from food) is already above the government's 'tolerable daily intake' for a third of the population so any extra dioxins from any source should be considered significant. A precautionary approach would be to allow no further increases in exposure until levels for all the population are well below "tolerable levels"

The proposed site impacts on a locally important site

Policy NE 14

Protection of Locally Important Sites

Development that is likely to have an adverse effect on a Site of Ecological or Geological Interest, Local Nature Reserve or Priority Habitat will not be permitted unless it can be clearly demonstrated that there are reasons for the proposals that outweigh the need to safeguard the nature conservation value of the site. Where necessary, Environmental Impact Assessments will be required to be submitted with development or other proposals. Where development is permitted the Council will make use of conditions or planning obligations to:

- i. minimise disturbance;
- ii. protect and enhance the site's nature conservation value; and
- iii. where damage is unavoidable, where appropriate require the developer to provide new or replacement habitats so that the total ecological resource remains at or above its current ecological value.

The proposed site impacts on a Wildlife Corridor

Policy NE 15

Development in Wildlife Corridors

Development will not be permitted in a Wildlife Corridor if it would:-

- iv. damage the physical continuity of the Corridor; or
- v. impair the functioning of the Corridor by preventing movement of species; or
- vi. harm the nature conservation value of the Corridor.

Where necessary, Environmental Impact Assessments will be required to be submitted with development or other proposals.

Where development is permitted the Council will make use of conditions or planning obligations to:

- a. minimise disturbance;
- b. protect and enhance the site's nature conservation value; and
- c. where damage is unavoidable, require, where necessary, the developer to provide new or replacement habitats so that the total ecological resource remains at or above its current ecological level.

The proposed site will have a detrimental effect on Green Belt Land directly contravening points i,ii and iii below.

#### Policy NE 3

##### Extension and Alteration to Other Buildings in the Green Belt

Except where provision is made in other UDP policies relating to the Green Belt, proposals for limited extension and/or alteration to buildings other than dwellings will be refused unless very special circumstances to justify inappropriate development are demonstrated. Where very special circumstances are demonstrated the following criteria will also be taken into consideration:-

- i. the development should not adversely affect the character, visual amenity and openness of the Green Belt; neither
- ii. result in disproportionate additions over and above the size of the original building; nor
- iii. harm other interests of acknowledged importance including the setting of Listed Buildings, the character or appearance of the Conservation Areas and valuable wildlife habitats and species.

The proposed site will have a detrimental effect on Green Belt Land directly contravening points iv,vi and ix below.

#### Policy NE 4

##### Conversion or Change of Use of Buildings in the Green Belt

Proposals for the conversion or change of use of buildings in the Green Belt will be permitted provided they meet the following criteria:-

- iv. the form, bulk and general design of the existing buildings are in keeping with their surroundings or can be improved in their appearance to remove any adverse impact on the landscape;
  - v. the buildings are of permanent and substantial construction and are capable of conversion without major or complete reconstruction;
  - vi. the conversion does not have a materially greater impact than the present use on the openness of Green Belt, and the purposes of including land in it or on the character of the countryside in general;
  - vii. the conversion does not cause traffic, amenity or servicing problems and does not give rise to pollution which outweighs the advantages of the conversion and which cannot be overcome by attaching conditions to the permission;
  - viii. adequate water supplies and means of drainage exist; and
  - ix. they would not harm other interests of acknowledged importance such as the setting of Listed Buildings, the character or appearance of Conservation Areas or valuable wildlife species and habitats.
- Preference will be given to schemes which result in the property being used for job creation.



The site will potentially produce forever chemicals such as PFAS.

The council do not have the resources required to monitor the activities of the Calder Valley Skip Hire company. The council can not guarantee that the company will operate the incinerator to optimal running conditions. If access to the incinerator is abused, with it being cheaper and more convenient for the company to burn waste than to deal with it by other means, then there is unacceptable risk to the health and well-being of all residents of the Valley.

Calderdale is already a borough with high levels of premature mortality. Further detriment to the air quality locally will exacerbate this existing problem that needs to be addressed.

Sowerby Bridge is already an area with poor air quality. It is one of the council's own air quality management areas. The council has a duty of care to residents to take actions that improve air quality in and around Sowerby Bridge.

One of the primary contributors to poor air quality is HGVs. Expansion of these sites will lead to an increase in HGVs operating in the area.

The site is at risk of flooding. It has been flooded before.

It is in close proximity to schools and nurseries and so represents a risk to health and well-being of young children who are particularly at risk from health risks associated with poor air quality.

It is in close proximity to Sowerby Bridge town centre. Any odours or smoke from the site will impact on the well-being of people visiting and shopping on Sowerby Bridge high Street. This will be detrimental to the local economy.

It is in close proximity to the canal. This is a tourist destination which generates footfall and revenue for the town of Sowerby Bridge.

Many walkers enjoy rambling along the canal and in the local woods. Many of these people will also visit the local pubs and businesses for refreshments.

If the council allow this proposed incinerator, they will be making a decision that impacts the health of residents for many years to come. If this is done for the purposes of saving money or making profit then all concerned have failed in their duty and have betrayed the trust of everyone they are employed to serve.

Kind regards,  
XXXXX

632 Dear Sir/Madam

I'm writing to object to the proposed incinerator in Sowerby Bridge.

My reasons:

- The valley the site is in is not at all suitable, even with a flue. The topography of the actual site has not been taken into account (calculations have been made from an entirely different type of land topography)
- There is more and more scientific evidence which shows how damaging air pollution is to people
- The valley is full of vulnerable people in care homes, nurseries and schools
- Increased industrial noise can affect the mental health of nearby residents
- The surrounding natural animals, plants and trees will be further affected - take a visit to the site and see how it is already impacted
- How will the company be monitored? they already have broken guidelines and rules in their existing and past businesses
- The council should have LONG TERM and cumulative impact in mind
- It is a backwards move in terms of the councils efforts to tackle climate crisis. The incinerators used in the Nordic countries have now been shown to have a negative impact on environmental efforts with plastic incineration being dirtier than coal
- PFAS released from waste into the air
- The site is at risk from flooding- releasing PFAS into the water

I hope that you will consider the community. There are other ways of making money, but you can't bring back people who die or reverse a poor quality of life . It is more difficult and costly to recover damaged nature. Think of additional costs and burden to the NHS and any clean up operations. Please choose to protect us and our environment.

Regards, XXXXX

633 Dear Sir/Madam,  
XXXXX

Environmental Permit application from Calder Valley Skip Hire, Reference: S13/006

I am reaching out to register my firm opposition to the proposed environmental permit concerning the installation of an incinerator within the Belmont Site situated in Sowerby Bridge. As a local resident, I am deeply troubled by the potential adverse effects on both health and the environment that such a facility may bring, particularly given its location within a valley.

I urge a thorough reassessment of the decision to approve the permit for constructing this incinerator. I appeal to you to prioritize the safety and environmental integrity of our community by declining this permit application.

Thank you for taking my concerns into account. I have faith that you will act with prudence and integrity in addressing this issue.

Yours sincerely,  
XXXXX

634 Hello,

I am raising my objection to the incinerator which is being applied for by Calder Valley Skip Hire. As a resident of Sowerby Bridge with three small children, I do not want their health to be compromised by continuous burning of rubbish in the valley, where smoke cannot adequately be released high enough up to ensure this does not happen. Sowerby Bridge is already a very busy place in respect of road traffic and does not need the air further polluting.

Thank you

XXXXX

635

Dear Sir/Madam,

I'm writing to object the incinerator which is planned on the Calder Valley Skip Hire site. I feel that it is the councils job to think long term and protect the residents of Sowerby Bridge if there is a risk to their health.

Please be aware of the recent studies of how air pollution contributes to early death and how it affects unborn children (causing low birth weight, early birth, or improper immune system development). A recent study shown in The Lancet tells of the gaps in air pollution monitoring and regulation.

I am concerned about the impact on human health and the health of the environment when an incinerator would be allowed to burn waste. Then government itself seeks to inform the public about the dangers of ""Forever Chemicals"" It does not make sense that our council would allow the release a steady stream of them into our community.

The United Nations have declared that humans have a right to clean air. This incinerator will not clean our air or keep it the same in terms of pollution. This is wrong, please do not approve this incinerator.

Yours sincerely, XXXXX

636 To whom it may concern,

I am writing to express my strong objection to the environmental permit application submitted by Calder Valley Skip Hire for the operation of a waste incinerator on Rochdale Road in Sowerby Bridge. As a concerned resident, I believe that granting this permit would have several adverse effects on our community and environment.

**Air Quality and Health Impact:**

The proposed incinerator would burn up to 10,000 tonnes of waste annually<sup>1</sup>. Such intense burning can release harmful pollutants into the air, affecting the health of residents, especially vulnerable groups like children and the elderly. Increased air pollution could exacerbate respiratory conditions and contribute to long-term health problems.

**Traffic Congestion and Safety:**

The transportation of waste to the site would lead to additional traffic congestion in the area. Large lorries carrying waste could further strain local roads and infrastructure. Safety concerns arise from heavy vehicles navigating through residential streets, posing risks to pedestrians and other road users.

**Environmental Impact:**

The proposed site is close to schools, and increased air pollution could harm children's health and well-being. The incinerator's emissions may also impact nearby Air Quality Management Areas, exacerbating existing pollution levels.

**Flood Risk:**

The site has recently experienced flooding, and any future development could result in waste entering the river. This poses a threat to water quality and aquatic ecosystems.

**Previous Refusals and Appeals:**

Calderdale Council previously refused a similar plan in 2017, and the subsequent appeal was dismissed by the government in 2023<sup>1</sup>. The decision to refuse planning permission was later overturned, but the environmental permit status remained undetermined due to legal challenges.

In light of these concerns, I urge the council to carefully consider the impact of granting an environmental permit for the proposed incinerator. Our community deserves clean air, safe roads, and protection from environmental hazards. Thank you for your attention to this matter. I trust that you will make an informed decision that prioritizes the well-being of

Sowerby Bridge residents and the environment.

Sincerely,  
XXXXX

637 Dear Calderdale Council.

After reading the document posted on Facebook recently of the proposed incinerator installation at Sowerby Bridge, I am writing to you to strongly oppose these plans, with regard to the implications to health and safety of people and our environment.

Kind regards.

XXXXX



638

Dear Sir/Madam,

I am writing to object to the proposal of the building of the Calder Valley incinerator, due to the unfair implications it is likely to have on the local residents, and the environment of Calderdale as a whole.

Firstly, the known effects of incinerators are incredibly concerning to myself and many others who live in the area close to the proposed site of construction. For instance, the significant decline in air quality, which is bound to be a consequence of a machine which burns refuse 24 hours a day, 5 days a week, is likely to have an immense impact on the health of local residents - particularly those who we should be protecting the most, such as children - globally, around 570,000 deaths of children under 5 can be attributed to air pollution - and the elderly, particularly (but not exclusively) those with pre-existing respiratory conditions. Respiratory disease affects 1 in 5 people, and is the third biggest cause of death in England, and this incinerator would only worsen the prevalence of these diseases in Calderdale. Long term exposure to the air pollutants produced by incinerators has an inevitable correlation with hospital admissions for lung conditions, and one has only to look at the research which has already been done in other areas, to realise that the health implications for the residents of Calderdale would be no different.

This particular impact would likely be most felt by the youngest in the community, as they would have more exposure over time to the harmful pollutants in the air, due to their more rapid breathing rate, and also the fact that children's lungs are still developing, so therefore more susceptible to damage. Furthermore, air pollution is linked to low birth weight, early birth and improper immune development in unborn children, which is bound to affect them increasingly in later life.

Secondly, it is almost impossible to predict the scale of the affects that the incinerator would have on local plants and wildlife. While the known environmental impact is already immense, it is difficult due to lack of conclusive evidence to predict just how widespread the problems would be. For example, while the animal wildlife of the area are likely to experience similar negative effects to those of the humans listed above, pollutants are more likely in plants to cause chlorosis, delayed flowering, damaged roots, damaged stomata which affects the efficiency of gas exchange, and stunted growth, as well as eroding their ability to absorb carbon dioxide, thus contributing towards global warming.

Thirdly, I must express concern around the motivations and ethical considerations (or lack thereof) of Calder Valley Skip Hire. It appears that this company has been known to break rules in the past regarding health and safety, and there seems to be a worrying lack of attention and concern towards the possibility that they may address this situation with similar carelessness. Not to mention the fact that there seems to be no clear plan of how the operation of the proposed

machine will be monitored.

In conclusion, I believe I am not alone in my deep concern around the safety, ethics and regulation of the incinerator, or the potential health impacts on the current residents and wildlife of Calderdale, and would urge you to consider all of these factors when you are making a judgement of whether this machine should be given an environmental permit.

Thank you,  
XXXXX

639 Good evening,

I am writing to strongly object to Calderdale Valley Skip Hire (CVSH) having permission to run an incinerator in Sowerby Bridge for the following reasons:

- the site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution.
- the site is at risk from flooding.
- insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict.
- competence of CVSH to run an incinerator.

It seems blatantly obvious that to grant permission would result in damage to the local environment and the health of local residents.

I ask that you take my objection, and that of others in my community seriously. We will not back down.

Yours sincerely,

XXXXX  
Sowerby Bridge

640 To Whom it May Concern

We are a young family that lives around 400 metres away from the proposed site for the incinerator.

We deal with enough pollution from the traffic that constantly moves through the town and worry any more will cause extra strain on our lungs.

The fact that this isn't even being voted on and left up to an individual / individuals fills us with trepidation that corruption could occur on this matter. This obviously will lead to a negative outcome in our opinion. How are they allowed to appeal until they get what they want?

Being born and bred in this town I have witnessed pollution increasing rapidly over the last few years. We are worried our health will deteriorate further.

We don't know the science behind the fumes and how bad they are going to be. All I know is that increasing combustion causes more fumes whatever you are burning, whether natural material or man made so it's going to be worse than it is now.

If those that have brought this application forward are that confident that fumes won't cause a problem they should live on the site themselves to put 'their money where their mouth is' and prove they don't suffer any adverse effects to the rest of us in a trial period. Can't see that happening but would be interested to see it.

Me, my wife and my two young boys of the ages of 4 and 7 implore you to do the right thing and refuse this application for a final time.

Regards

XXXXX

641 Hi there,

I am writing to strongly object to Calderdale Valley Skip Hire (CVSH) having permission to run an incinerator in Sowerby Bridge for the following reasons:

- the site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution.
- the site is at risk from flooding.
- insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict.
- competence of CVSH to run an incinerator.
- the "safety" and "well being" of CVSH personnel.

It seems blatantly obvious that to grant permission would result in damage to the local environment and the health of local residents.

I ask that you take my objection, and that of others in my community seriously. We will not back down.

Yours sincerely,  
XXXXX

Issues of concern 1. Unknown impact on human health : harmful emissions The modelling of air pollution does not satisfactorily represent the conditions in the valley even with rough surface calculations. The stack height is low, the point of emission is near level with the houses on Rochdale Road and the mixing of air / dilution of pollution at the point of emission is unknown. There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on 1 particular model which does not allow for the topography, the woodland, the inversions in this valley. Each report for air quality, uses terms like, estimates, projected, calculated based on a model of air distribution at Leeds airport. Some parameters have been set with the agreement of CVSH which is inappropriate. The valley suffers from inversions which will keep the pollution in the air that we breathe at low levels. The stack height should be much higher in this location. Is it really acceptable to allow a risk to human health levels of dioxins and furans are predicted to be higher in the area and yet these are only estimates. On this basis alone the permit should be refused. The flue is not high enough to achieve dilution - the risk to human health has not been adequately determined and the effect on human health will be SIGNIFICANT.

2. Air quality The addition of this significant amount of emissions to atmosphere will impact on air quality within the boundary. The data provided by the applicant shows much higher pollution levels at Spring Hill Mills area, this is due to prevailing wind conditions. Pollutants when they are able to disperse in the winter months will likely blow into the AQMA having a seriously detrimental impact on air quality within the AQMA and surrounding areas. The original submission suggested that there won't be an increase in waste transfer in or out of site. This is incredulous. A business will operate to achieve maximum profit. It is profitable now bringing in waste sorting and moving waste to landfill. This operation will continue and the site will take in more waste to burn - numbers of vehicles to site will likely double if not triple. The effect on the AQMA will be SIGNIFICANT.

3. Noise The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door open for much of the time impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that during the day but especially at night.

4. Flora and Fauna Much has been made of the trees which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact of hot gases on these trees, how these harmful chemicals will affect the local ecology? Deer roam the woods, badgers, cuckoos, the woods are alive with birds and animals, how is

nature to be protected. The flue is not high enough to allow gases to escape and the environment will be harmed.

5. Enforcement CMBC have insufficient resources to ensure adequate enforcement a severe lack of specialists to deal with such a site, and there is also an apathy towards enforcement. The Authority has been threatened with litigation by CVSH, how so can they then take enforcement action against them now?

6. Probable amendment to hours of operation As above the company will want to make profit, it is likely (more than likely) that they will want to extend operating hours which will further impact on the matters raised above. REFUSAL ON THE GROUNDS: Inadequate dispersal and dilution of chemicals which are harmful to human health. \*The Stack height is inadequate \*Dilution is negatively affected by the location of the of the plant in the valley bottom \*Dispersal is negatively affected by the location of the emission point of the flue \*Dispersal is negatively affected by the trees \*Dispersal is negatively affected by inversions \*Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology. THE PERMIT SHOULD BE REFUSED

Thank you for registering my objection

XXXXX

643

As a local resident who has been campaigning against this proposal for over 9 years, I am disappointed to have yet another application to object to.

I am already concerned about the impact of poor air quality on the health of our community, but to operate a waste incinerator would be disastrous. Moreover, this is proposed to be operated in a deep valley by a company with a track record of breaches of license conditions. They clearly are profit driven with no regard for the health of residents. This would affect us all, but would have worst effects on people who live in the vicinity, those with lung and chest conditions, the very young and the oldest. I have walked around this site on a number of occasions and have observed it is not well managed: there are piles of rubbish and in the floods of 2015, a great deal of the detritus that was retrieved from the river several miles away had been from CVSH's site.

After the last inquiry concluded this could not fail to have negative impacts on health, I cannot see how any decision to approve the permit could be made. Furthermore, a recent email from the Met Office has explained they cannot meaningfully assess conditions in the valley so CVSH's modelling from Leeds Bradford airport is proved irrelevant.

yours

XXXXX 😊

644

Schedule 13 Small Waste incineration

Dear Sir / Madam

I am writing to object to the proposed incinerator at Ryburn Valley.

Sowerby Bridge already has enough problems with poor air quality from the main rd into Sowerby Bridge and from the M62.

It was also disappointing that the River Calder from Todmorden to Halifax is one of the top most polluted rivers.

What Sowerby Bridge doesn't need is further pollution and filthy air.

Please do not allow further pollution with this incinerator.

XXXXX



645 Dear Sir/madam,

I am a local resident in Sowerby Bridge. I am perturbed that yet another application has been made for an Environmental Permit by CVSH at the Belmont site.

Given that the Government Inspectorate has deemed the previous application at the Judicial review in November 2022 to be quashed given the height and proximity of the chimney stack to trees and woodland he was:- “ unable to find that waste gasses from the incinerator would be discharged in a controlled way as to safeguard Human Health and the environment.

It worries me that the current application has been altered and one important factor of asking the operator for records at any time has been removed.

This surely is not acceptable given the Council’s responsibility to local residents to monitor air pollution in the area.

Given that the AQMA readings have been missing for some time in Sowerby Bridge, and previous readings were above legal limits I feel that it would be folly to add more life threatening pollutants into the local area.

The Council should not be adding to the already poor air quality.

The Councils own Air Pollution plan in your own words has plans to reduce air pollution and its impacts based on the current situation locally and the key contributors to poor air quality in the borough.

The Council and our Government also states that Poor Air Quality is the Largest Environmental Risk to Public Health;- people being exposed to poor air have a reduced life expectancy through Cardiovascular and Respiratory Diseases and Lung Cancer.

The children in the town and surrounding areas are most vulnerable.

This has a serious effect at our already busy Hospitals.

How therefore can the Council improve Air Quality if it is NOT monitoring the site?

The monitoring station in Sowerby Bridge when I looked on the Council website has not been updated due to technical

issues, this is not acceptable, making the Council culpable to neglect of its responsibility for public health.

Part IV of the Environmental Act places a Statutory Duty on a Local Authority to carry out a process of review and assessments of Air Quality in its area against objectives for eight pollutants.

Regarding the protection of Air Quality; Developments which may cause Air Pollution ( including modes of transport) will only be permitted if: It Would Not Harm the Quality and Enjoyment of the Environment.

Ensure that Air Quality is fully considered in all Environmental Impact Assessments and traffic Impact assessments.

Fully consider potential exposure to exposure to existing air pollution within AQMA.

Ensure that new developments are located, designed and managed so that number of additional vehicle journeys are minimised.

Ensure that the new development shall where appropriate contribute to the provision of transport infrastructure for walking, cycling and highway improvements through section 106 agreements or community infrastructure levy.

Has there been a Strategic Environmental Assessment, which is a mandatory requirement for this type of assessment.

I feel that should the environmental permit be granted it would decimate the tourism in our town .

The impact of this controversial permit will also impact on the young children in our local schools and nurseries These children are the future of this town and as minors should be protected both now and in future years.

How can the Council possibly encourage local residents and visitors to take up walking, cycling and other outdoor activities if the Air Quality is going to be contaminated with pollutants.

On the issue of Air Quality the application should not be granted.

Data from a site many miles away where the topography is completely different to that in our beautiful steep sided valley does not give a true picture of the dangers that occur when weather conditions change. Inversion in the valley is also a major factor for refusing this application.

There are many technical issues with this application not being addressed by the Council, however they are equally

important WHY?

On all these issues I respectfully ask that this Environmental Permit be refused.

I conclude by Objecting vehemently to this Environmental Permit being granted.

646 To Calderdale Council,

Regarding the ongoing dispute surrounding the positioning of a new incineration works proposed for the outskirts of Sowerby Bridge.

#### THE PROBLEM

I think it is a mistake to pick out and personalise the skip company and their owners as the ' BAD GUYS ' .

Instead I would suggest depersonalising the discussion and simply concentrate on the inappropriate positioning of an incinerator in this location, more of a common sense approach.

In Old Town above Hebden Bridge airborne asbestos from Acre Mill still leaves its mark.

If I worked for Calderdale Council, I wouldn't want it on my conscience for giving permission to pump endless unknown airborne foreign bodies into the sky above Sowerby Bridge.

If any of the safety promises that are made ,are in any way inaccurate and the resulting consequences are catastrophic ,then beware Calderdale council.

If this incinerator is activated by the council, the children under their care today will come looking for them in the future if Calderdale get this wrong.

#### THE SOLUTION

If incineration is a necessary part of Calderdale's waste management strategy then I would vote for the council swapping the land owned by the skip company for a parcel of land owned by the council that is more appropriate for the incineration process and not down wind of one of its towns.

#### OUTCOME

If the correct council owned land is identified and it is acceptable to the skip company, in a location that works better for them in the long run ,then I would hope they would welcome the opportunity to contribute to a safer greener future for Sowerby Bridge and become the ' GOOD GUYS ' in this saga.

#### FUTURE

The land on the outskirts of Sowerby Bridge could then be part of a beautiful nature corridor and a real resource for the community rather than being a dark cloud hanging over the health of all our residents.

Cape Asbestos Acre Mill: Exposure as a child leads to mesothelioma

[View all news](#)

04 Nov 2018

Allan Harris of West Yorkshire was diagnosed with mesothelioma, an asbestos related cancer, in November 2017. As is usual, his doctors asked him about his work history but Allan could not remember being exposed to asbestos in any of his jobs. The only contact he could recall with asbestos was from Cape's Asbestos Factory, Acre Mill, in Hebden Bridge. With the help of Fozia Hussain, Allan's case settled for a six figure amount without issuing court proceedings. Allan, his mother and brother moved to the village of Old Town above Hebden Bridge in Spring 1948 when Allan was just a little boy. The family were invited to Old Town by Allan's maternal aunt, Ella, who worked for Cape as a spinner. Allan's exposure to asbestos was typical of many children who lived in the area during that period.

Best regards from a concerned resident.

XXXXX

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"

647 I wrote, objecting to the Incinerator on the Belmont site, 27.03.24. Since then additional information has become available which is further evidence that the Incinerator without doubt should not be built & operated on the proposed site or anywhere else in the Ryburn Valley.

The Met Office in their recent reply to a series of questions from a local objector state that ....a senior data scientists says “....that is exactly the kind of application we cannot support. That is a very narrow, deep valley (500m wide) that simply will not be resolved by our analyses or NWP (2km). We could not meaningfully assess conditions within that valley. Meteorological convention would suggest that the valley would be prone to inversions/cold air pooling.”

It is clear that data has not been obtained by the applicant for the Incinerator: postcode HX6 3LL, not can it be meaningfully assessed/obtained.

This is definite evidence that the gases that would be discharged from the chimney stack would cause pollution. This is entirely unacceptable and backs up the Government planning Inspector's view when he refused the application last July. Please do not now or ever allow the building or operation of an Incinerator in the Ryburn Valley.

with regards  
XXXXX

648 Dear Sirs,

I write on behalf of the GP partners at XXXXX, Sowerby Bridge, to object in the strongest possible terms to a permit being granted to Calder Valley Skip Hire for the continuous burning of waste.

As you should be aware we reside in an area with higher than national averages of respiratory diseases like asthma and COPD. Our clinical opinion is that granting this permit and allowing this company to incinerate waste, which will discharge gases into an area which is already suffering from pollution and poor air quality, would be catastrophic for our patients. Indeed, we understand that the original application was refused based on the professional opinion of the government's own planning inspector and his view that the environment could not be safeguarded should the planned incinerator go ahead.

As you are aware, CVSH sits at the bottom of a valley, and the concerns we have include the amount of pollution/particles which will sit in this valley after incineration and consequently be breathed in by local residents. There seems to be little evidence to suggest that this will dissipate without having a detrimental effect on the already poor air quality.

Our clinical team already see respiratory cases whose numbers are higher than the national average, and believe that, were this application to be granted, it would have a severely detrimental effect on the long term health of the local populace.

We urge you to refuse this application.

Kind regards

XXXXX

649

Hello,

I own a house on XXXXX just a few hundred yards from Calderdale Valley Skip Hire.

To hear of another renewed application for an incinerator(despite the many previous objections and refusals) is distressing. The quality of air through both the incinerator and wagons bringing waste in will be hugely detrimental to my health and my family's health and I have major concerns for the local environment, trees and wildlife.

Some further points I'd like to make:

- the site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution and it is close to a air quality management area
- The site is within 2km from more than 8 schools
- Homes, residential areas and businesses are all in the area
- the site is at risk from flooding
- insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict
- Calder Valley Skip Hire have not displayed any competence to to run an incinerator

Please ensure this doesn't go ahead and protect our clean air!

Thank you

XXXXX



650

Hello,

I own a house on XXXXX just a few hundred yards from Calderdale Valley Skip Hire.

To hear of another renewed application for an incinerator(despite the many previous objections and refusals) is distressing. The quality of air through both the incinerator and wagons bringing waste in will be hugely detrimental to my health and my family's health and I have major concerns for the local environment, trees and wildlife.

Some further points I'd like to make:

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- The site is within 2km from more than 8 schools
- Homes, residential areas and businesses are all in the area
- the site is at risk from flooding
- insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict
- Calder Valley Skip Hire have not displayed any competence to to run an incinerator

Please ensure this doesn't go ahead and protect our clean air!

Thank you

XXXXX

651 Good evening,

I wanting to email my rejection to the request to add an incinerator to the calder valley skip hire site.

The site is unsuitable for this, it is in a valley with a main road adjacent which is already regularly congested causing increased levels of pollution.

This request has been rejected on numerous occasions, I am baffled how this is still ongoing.

Regards

XXXXX

652 To whom it may concern,

I XXXXX wholeheartedly object to an environmental permit being granted to Calder Valley Skip Hire to operate a waste incinerator.

Firstly, With the risk to not only me and my families health but that of the wildlife we strongly object to the idea of even more pollution within where we live. What will it cost for us to be able to breathe fresh clean air?

Furthermore, I believe the site to be totally unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution. How can/ would these waste gases from the incinerator be discharged in a controlled way? Who will safeguard our health?

Theres already smog that lies in the valley like a smothering plague. Inversion will allow waste gases from the incinerator to congregate and further damage the quality of air. With the insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict. This therefore puts the competence of CVSH to run an incinerator under considerable doubt.

The site itself is at high risk of flooding as its close to the river and retains all the water which comes down from the hills.

There are also already a considerable amount of lorries moving back and forth from the site leaving the patch of road directly outside the site in disrepair.

Lastly, we currently teach our young people to take care of the environment and respect it so it'll be around for years to come. It starts with the voices being heard from those that want to protect the future for themselves and others. We are the role models for those to come and by complying to polluting the environment further we won't ever promote real change.

I hope you consider my objections for the sake of the local community's health and overall well-being.

Everyone deserves to breathe clean air.

Yours sincerely

XXXXX

653	<p>Dear Sir / Madam</p> <p>I am registering my objection to Calder Valley Skip Hire's further proposal for an incinerator in Sowerby Bridge on the grounds of increased air pollution and environmental concerns in the valley and surrounding residential areas.</p> <p>Many thanks,</p> <p>XXXXX Resident of Sowerby Bridge.</p> <p>Sent from my iPhone</p>
654	SEE ATTACHMENT
655	SEE ATTACHMENT
656	<p>I DON'T</p> <p>KNOW HOW MANY TIMES WE NEED TO OBJECT TO THIS, PERMISSION HAS BEEN REFUSES SEVERAL TIMES NOW SO WHY ARE THEY ALLOWED TO KEEP APPEALING? THE SITE CANNOT CONTROL THEIR WASTE, A FEW YEARS BACK THEY WERE REPORTED TO THE EA FOR STORING ROTTING WASTE WHICH FILLED THE VALLEY WITH A ROTTEN EGG TYPE SMELL, THEY ARE STILL DOING THIS, ON DAYS WITH NO WIND THE SMELL STILL DRIFTS UP THE VALLEY AND CAN ALSO BE SEEN AND SMELT WHEN WALKING ALONG THE PUBLIC FOOTPATH WHICH GOES THROUGH THE SITE. THE SITE HAS ALSO HAD SEVERAL FIRES WHICH HAS FILLED THE VALLEY WITH SMOKE. SMOKE AND FOG LINGERS AND DOES NOT DISPERSE ON DAYS WITHOUT WIND, THE INCINERATOR WILL ONLY MAKE THIS WORSE AND SHOULDN'T BE ALLOWED TO GO AHEAD FOR THE HEALTH OF EVERYONE THAT LIVES IN THE VALLEY, THIS SITE NEEDS CLOSING DOWN,ITS NOISY AND THEY HAVE SPOILT THE SURROUNDING AREA IN THE RYBURN VALLEY WOODS WITH RUBBISH AND UNSIGHTLY MACHINERY LITTERED AROUND THE SITE. NO MEANS NO AGAIN, WHEN WILL THEY GET THE MESSAGE!</p> <p>XXXXX local resident</p>

### 1. Unknown impact on human health : harmful emissions

The modelling of air pollution does not satisfactorily represent the conditions in the valley even with rough surface calculations. The stack height is low, the point of emission is near level with the houses on Rochdale Road and the mixing of air / dilution of pollution at the point of emission is unknown. There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on 1 particular model which does not allow for the topography, the woodland, the inversions in this valley.

Each report for air quality, uses terms like, estimates, projected, calculated based on a model of air distribution at Leeds airport. Some parameters have been set with the agreement of CVSH which is inappropriate. The valley suffers from inversions which will keep the pollution in the air that we breathe at low levels. The stack height should be much higher in this location.

Is it really acceptable to allow a risk to human health levels of dioxins and furans are predicted to be higher in the area and yet these are only estimates. On this basis alone the permit should be refused. The flue is not high enough to achieve dilution - the risk to human health has not been adequately determined and the effect on human health will be SIGNIFICANT.

### 2. Air quality

The addition of this significant amount of emissions to atmosphere will impact on air quality within the boundary. The data provided by the applicant shows much higher pollution levels at Spring hill mills area, this is due to prevailing wind conditions. Pollutants when they are able to disperse in the winter months will likely blow into the AQMA having a seriously detrimental impact on air quality within the AQMA and surrounding areas.

The original submission suggested that there won't be an increase in waste transfer in or out of site. This is incredulous. A business will operate to achieve maximum profit. It is profitable now bringing in waste sorting and moving waste to landfill. This operation will continue and the site will take in more waste to burn - numbers of vehicles to site will likely double if not triple. The effect on the AQMA will be SIGNIFICANT.

### 3. Noise

The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door open for

much of the time impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that during the day but especially at night.

#### 4. Flora and Fauna

Much has been made of the trees which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact of hot gases on these trees, how these harmful chemicals will affect the local ecology? Deer roam the woods, badgers, cuckoos, the woods are alive with birds and animals, how is nature to be protected. The flue is not high enough to allow gases to escape and the environment will be harmed.

#### 5. Enforcement

CMBC have insufficient resources to ensure adequate enforcement a severe lack of specialists to deal with such a site, and there is also an apathy towards enforcement. The Authority has been threatened with litigation by CVSH, how so can they then take enforcement action against them now?

#### 6. Probable amendment to hours of operation

As above the company will want to make profit, it is likely (more than likely) that they will want to extend operating hours which will further impact on the matters raised above.

#### REFUSAL ON THE GROUNDS:

Inadequate dispersal and dilution of chemicals which are harmful to human health.

- \*The Stack height is inadequate

- \*Dilution is negatively affected by the location of the of the plant in the valley bottom

- \*Dispersal is negatively affected by the location of the emission point of the flue

- \*Dispersal is negatively affected by the trees

- \*Dispersal is negatively affected by inversions

- \*Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology.

- \*Too close to too many local schools

THE PERMIT SHOULD BE REFUSED

658 Dear Sir/ Madam,

I would like to express my concerns about the plans for the incinerator plant in Sowerby Bridge S13/006.

My children go to nursery and school in Ryburn valley and their health and safety is of my utmost concern.

Recent information from the Met Office who said: this is the kind of application we could not support as we could not meaningfully assess conditions within that narrow deep valley which would be prone to inversions/cold air pooling. This reply from the Met Office must be very strong evidence that there should not be an incinerator on that site.

- In July 2023 a Government Planning Inspector refused the application due to concerns about the discharge of waste gases and their risks to the health of local people and the environment.
- All elected representatives and MPs have opposed this application, reflecting strong local objections. Breathing clean air is a basic right that should be protected for our community
- Polluting gases from the chimney will not be dispersed above the level of the houses along the valley and hillsides but will be in the air breathed by all who live here. There are 9 schools within 1 mile and 18 schools within 2 miles of the chimney. The schools in close proximity are all above the proposed chimney height. A public footpath runs close to the site. Calderdale had the highest rate of respiratory tract infections in West Yorkshire for infants under one year in 2016 & asthma admissions in 2019.
- The proposal uses data from the weather station at Leeds Bradford Airport to show that the gases will be dispersed. This is nowhere near the Ryburn Valley and the landform is completely different. The steep-sided Ryburn valley and prevailing winds mean that emissions will frequently blow towards the centre of the local population. In windless conditions, local residents regularly see smoke and mist hanging for long periods in the valley.
- There are reasonable doubts as to whether CVSH would operate an incinerator correctly. Already, there have been several fires and there is also a flood risk. CVSH have shown the wrong postcode on the application for a place not at risk of flooding.
- It is concerning that the application removes the Council's ability to request site diaries and inspection records to



monitor compliance.

Please refuse this application. The risks to our air quality and health are simply too high.

Regards  
XXXXX

659 Dear Sirs

I am writing to express my objection to the proposed Sowerby Bridge incinerator. I believe that allowing the incinerator to operate in the area will be severely detrimental to the air quality and pose a risk to the local environment and population.

Yours sincerely

XXXXX

660 Dear Calderdale Council (Head of Environmental Health, Councillors with environmental health/planning responsibilities and Council Chief Executive)

I would like to object to the proposal to award the planned incinerator permission to operate for the following reasons-

1. In July 2023 a Government Planning Inspector refused the application due to concerns about the discharge of waste gasses and the risk to the environment and people's health that they pose.
2. The application has been opposed by elected representatives and MPs - reflecting the very strong local objections to the incinerator. Breathing clean air is a basic right that should be protected for our community. In particular, children's health should be protected and there are schools and nurseries nearby.
3. Polluting gases from the chimney will not be dispersed above the level of houses along the valley and hillsides but will be in the air - affecting those who live here. As mentioned, there are 9 schools within 1 mile and 18 schools within 2 miles of the chimney. The schools in close proximity are all above the proposed chimney height. A public footpath runs close to the site. Calderdale has the highest rate of respiratory tract infections in West Yorkshire for infants under one year old in 2016 and asthma admissions in 2019.
4. The proposal uses data from the weather station at Leeds Bradford Airport to show that gases will be dispersed. This is no where near the Ryburn Valley and the landform is completely different. The steep-sided Ryburn Valley and prevailing winds mean that emissions will frequently blow towards the centre of the local population. In windless conditions, local residents regularly see smoke and mist hanging in the valley for long periods of time.
5. There are reasonable doubts as to whether CVSH would operate an incinerator correctly. Already there have been several fires and there is also a flood risk. CVSH have shown the wrong post code on the application for a place not at risk of flooding.
6. It is concerning that the application removes the Council's ability to request site diaries and inspection records to

monitor compliance.

Please refuse this application. It is based on incorrect and misleading details and poses unacceptable risks to our health and air quality.

Thank you.  
XXXXX

661

XXXXXX

Dear Sirs,

Calder Valley Skip Hire Incinerator - Objection

I wish to register my objection to the installation of a waste incineration plant in the Ryburn Valley. I live on the XXXXX of the Ryburn Valley directly above the proposed site and am all too aware of the effect of temperature inversions on smoke and fumes in this narrow valley.

The wind modelling used in this submission is not based on local and unique conditions which prevail in the Ryburn Valley and on that basis the application must be rejected.

Yours faithfully.

XXXXXX

662 Dear Sirs

I object in the strongest terms to CVSH's resubmitted application for an Environmental Permit to operate the waste incinerator at their Belmont site on Rochdale Road Sowerby Bridge.

My home of 23 years, XXXXX, is below the A58 road level only a few hundred yards west of the incinerator and faces east, towards CVSH's site.

My home is grade II listed and, as such, has single glazing, draughty windows and open chimneys which I am unable to change due to its listing. Poisonous fumes emanating from the incinerator will easily enter my home and adversely affect my health.

When there was a fire at CVSH a few years ago, my home was filled with fumes which hung in the valley bottom and took over a week to disperse.

During times of inversion, which occur on a regularly frequent basis, clouds hang in the valley bottom. No doubt fumes from the incinerator will do similarly.

I understand air quality data in support of the permit application was based on the nearest available weather station data at Leeds/Bradford airport. It is incomprehensible to think that this could be considered relevant as one site is deep in a wooded valley with no opportunity for fume dispersal and the other is high on an escarpment.

In normal site operating conditions there are regular strange odours which float up the valley and large clouds of flies. Additionally, I regularly have to pick up detritus which has blown off vehicles going to and from the site.

I can already hear noise from the site during the day. No doubt in the still of night this will be even more noticeable should permission for the incinerator's 24 hour operation be granted.

The area of the Ryburn valley is rich in wildlife, both flora and fauna, which will no doubt be adversely affected by the increased pollution.

The value of my property will, no doubt, be adversely affected by the granting of operating permission.

For the wider community, there is huge concern regarding the potential overturning of the refusal of the environmental permit. This is not because the people of the Ryburn Valley and Sowerby Bridge (where air quality is already poor) are a bunch of NIMBYs but rather from a genuine concern that the operation of such an incinerator in such unique geological and environmental conditions will have a serious impact on their health and that of their children.

CVSH are not good neighbours at the best of times. Their site has flooded badly in the past raising questions about its suitability so close to the river Ryburn. I am far from convinced that CVSH would operate an incinerator with consideration for the environment and community but rather their main focus would be on personal financial gain. I am informed by a number of different individuals that CVSH representatives are not averse to using bribery and/or threats to achieve their objectives. Why would CMBC trust such an organisation?

XXXXX

663 I object to the incinerator In the Ryburn valley .  
Due to pollution issues heath issue that can occur XXXXX

Sent from my iPhone

664 Dear sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours,

XXXXX



665

Good Morning,

I am writing to raise an objection to the Sowerby Bridge Incinerator planning application (Calderdale planning S13/006). I have concerns around the process and environmental impact of this application.

I am a father of a two-year-old with my partner expecting our second at the end of April. We live in Norland directly above the Calder Valley Skip Hire and the thought of the incinerator at the site fills me with dread for my family.

My first objection is that this is a repeat application of one that has already been rejected. There are no practical changes for improvement to the new application. This suggests that the outcome should therefore be the same and it should be rejected. Within this objection, I would like to add that the previous application was voted on. For some reason the application this time around is not subject to a vote. This is highly concerning to me and raises huge questions around the transparency of the process.

The second objection surrounds the environment and air quality in the region. This application for an incinerator will release an untold amount of fumes in a valley where clouds and mist sit for days. It is therefore a terrible idea - particularly for the health and clean air of the valley. Sowerby Bridge is already an Air Quality Management area so the idea of adding further fumes and noxious gases completely goes against the goals of Calderdale's clean air campaigns (such as Let's Clear The Air). Clouds in the valley frequently inverse. The fumes from a 24-hour incinerator will be no different. Furthermore, one of the main suggestions of the Environmental Inspector to the previous application was to increase the chimney stack height to a safe level as it does not even reach above the trees, never mind roads - the stack height has not changed between applications so again why should the response to the application?

Finally, there is no benefit to the community nor is there a benefit to the environment to approve this or future applications for an incinerator. There is sufficient incinerator capacity in the area without adding further. This is solely an application to improve Calder Valley Skip Hire's profit at the expense of and without regard for the environment and the local public. I ask that you reject the application once more for the sake of the community and the health of my young family.

Yours sincerely,

XXXXX

Address:

XXXXX

666 Dear Sir/Madam,

I am writing in objection to the proposed Sowerby Bridge incinerator. Allowing the incinerator to operate in the area will be detrimental to the air quality, most likely also creating noise pollution within the valley too. Therefore it poses a significant risk to the local environment and community. Sowerby bridge sees deprivation in some of its areas and social resilience is low made worse by the cost of living crisis. The community deserves to not have further strain in regard to health and resilience. Additions to the community need to be positive and strengthening.

Yours sincerely

XXXXX

667 I object to the application by Calder Valley skip hire to install an industrial incinerator for the below reasons:

Harmful emissions and unknown impact on human health.

As previously outlined the site does not meet satisfactory requirements for an incinerator. The stack height is low.

Air quality

Noise

Flaura and fauna

Enforcement - CMBC don't have sufficient resources to ensure adequate enforcement. There is a lack of specialist staff to deal with such a site.

Likely amendment of hours of operation.

Regards XXXXX

668 I object strongly to the proposal to build an incinerator in Sowerby Bridge on the grounds of the potential detrimental effects to people and wildlife in the vicinity and further afield.

An increase in heavy traffic will generate more pollution on an already busy road. It will cause disruption to road users and families living in the vicinity. Congestion is already frequent, especially when an incident on the M62 has caused drivers to divert through Sowerby Bridge. Increased traffic-generated by heavy incinerator-bound lorries will exacerbate the problem.

Has a wildlife survey been carried out to ascertain the effects of the incinerator through building on the land? Destruction of wildlife habitats, pollutants, traffic noise and the increase in harmful emissions will affect already endangered creatures such as amphibians and wild bee populations.

There seems, at present, no guarantee that emissions from the incinerator will be strictly controlled. This is worrying. Emissions from burned refuse is highly toxic and there is a danger that these emissions will be injurious to health. If the incinerator operates 24 hours concern has been voiced that toxic emissions could be released at night thus avoiding detection.

The proposed incinerator is situated in the valley where possible harmful emissions will mainly reside. If windy, the possible emissions can reach the hillside above causing further damage to the population and wildlife.

In short, the decision to build and operate the incinerator is distressing and highly detrimental to a the population and environment in a wide area but in particular to those living close by in the valley setting.

Please show Calderdale Council is the stoic, principled and fearless council it is. Stand up and reject this proposal for the good of everyone.

XXXXX

669 Dear Calderdale MBC Environmental Health,

I am writing to express my strong objection to Calder Valley Skip Hire's application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

This is a resubmitted application after their original proposal was rightfully refused at appeal in July 2023 by a Government Planning Inspector due to concerns about the discharge of waste gases and protecting human health and the environment.

Sowerby Bridge is already an Air Quality Management Area suffering from pollution issues. Having the incinerator just 670 meters away with its smoke and emissions regularly blowing into the valley bottom is unacceptable. There are valid doubts about the air quality models presented not accurately accounting for local weather patterns and inversions that can trap pollutants.

Furthermore, it is extremely concerning that the new application has removed the Council's ability to request site diaries and inspection records to monitor compliance. There must be transparency and oversight over operations.

All elected representatives - councilors across parties and MPs - have rightly opposed this application from the start. Breathing clean air is a basic right that should be protected for our community.

I urge you to listen to the residents and reject this incinerator permit application once again. The risks to our air quality and health are simply too high.

Thank you for your consideration.

Kind regards,  
XXXXX

670

We were appalled to find out that the planning application has been resubmitted for an Incinerator at Sowerby Bridge. We listened to all the evidence put forward last time and fully agreed with the Government Inspector's conclusion. We naturally thought that the decision of the expert Government inspector would be final and binding and are at a loss to understand how that decision, reached after considering evidence from many other experts, can now be ignored.

Sowerby Bridge is already suffering from traffic pollution, this has been acknowledged in the past by the council and their concerns expressed following Air Quality Management surveys. That situation is now further exacerbated on the frequent days when there is a problem on the M62 with queueing traffic diverted through our valley. The residents of Calderdale have been patient throughout 3 years of road works at nearby Salterhebble, an impressive scheme which I fully support, but which was justified by the council because of the need to reduce traffic pollution in the area. To spend £120million on the A629 scheme in order to reduce pollution and now consider sending extra lorries through Sowerby Bridge in addition to any pollution from the incinerator itself seems like madness!

We urge the Council Officers to listen to the residents of Sowerby Bridge whose health could severely be put at risk through further more poor air quality and finally refuse once and for all this planning application.

XXXXX

671 To whom it may concern

I feel that the most-compelling point to raise is competence of CVSH, a commercial body with a track record of breaches of license conditions and/or poor management of it's sites, to run an incinerator.

The 2015 flooding of the site led to a widespread distribution of rubbish from it many miles downstream. Walking close to the site allows anyone to observe piles of rubbish that could cause similar pollution in the event of another flood. I am not aware that the risk of further flooding has been reduced by any completion of extensive flood-prevention/mitigation works in the valley.

Another event in 2015 seems relevant, when the stench from an accumulation of waste at the site (of the planned incinerator) caused a large number of complaints and subsequent intervention of Council Officers.

A 2017 fire on the Belmont site led to smoke lingering in the valley for an appreciable period. Unless there is sufficient site-specific modelling to suggest similar prevailing weather conditions are not to be present during routine operation of an incinerator, there would seem to be a significant risk of additional air pollution in a deep-sided, tree-lined, residential valley. There are already high levels of concern over poor air quality in the valley, partly because it is prone to the type of temperature inversions that lead to trapping of air, air-bourne chemicals/toxins and the particulates carried in smoke.

Regards  
XXXXX

672

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We urge the Council Officers to listen to the residents of Sowerby Bridge whose health could severely be put at risk through further more poor air quality and finally refuse once and for all this planning application.

XXXXX

673

To whom it may concern, I am writing to express my strong objection to the Environmental Permit from Calder Valley Skip Hire to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

This permit would be harmful to the community and environment for the following reasons.

\* Air quality - this burning would release harmful pollutants into the air, affecting the health of residents. There are several schools close to this site as well as public footpaths. The site is situated in a steep valley where smoke and emissions would regularly sit in the bottom. Sowerby Bridge is already suffering from pollution issues.

\* Traffic management - the extra transportation means additional traffic to an already congested Sowerby Bridge. This is a strain on local roads, many of which are not suitable for heavy vehicles. As a local resident I have already seen the larger vehicles approaching from Ripponden that are unable to turn right into the site causing them to drive past and find somewhere to turn around.

\* Flood risk - the site has already experienced flooding, and any future development could result in waste entering the river causing a threat to water quality and aquatic ecosystems.

\* previous refusals - a government planning inspector refused the application in July 2023 due to the concerns about the discharge of waste gases and risks to the health of local people and the environment.

\* Wildlife and Countryside Act 1981 Part 1 - the protection of birds, animals and plants. This would be at serious risk if the permit is allowed due to the reasons already stated, pollution, flooding etc. We are lucky enough to live where we regularly see deers, birds including barn owls, what would happen to these ?

Calderdale Council aims to be the Best Borough in the North, quoting that we have more public rights of way, many which would be affected if the permit is allowed.

I request that this application is refused. We all deserve clean air, safe roads and protection from environmental hazards, the risks are too great.

Regards



XXXXX  
Sent from my iPad

674 Dear Sirs

I write to put forward my objection to the application by Calder Valley Skip Hire for an Environmental Permit S13/006.

The previous application dated 5 August 2020 was refused at appeal on the 5 July 2023 by the Planning Inspector appointed by the Secretary of State John Woolcock. Calder Valley Skip Hire did not appeal against this decision by the Planning Inspector and have instead re-submitted an application which I understand the Council (elected representatives) are refusing to vote on and are instead asking Council Officers to decide, which in my opinion is unfair, unjust and underhand.

If I refer back The Planning Inspector John Woolcock concluded that the appeal should be dismissed because he was not satisfied on the evidence adduced that the proposal complies with IED Article 46 1 which requires that waste gases from waste incineration plants and waste co-incineration plants shall be discharged in a controlled way by means of a stack the height of which is calculated in such a way as to safeguard human health and the environment. Furthermore he put, he was unable to find that the necessary measures have been taken to ensure that waste management would be carried out without endangering human health, without harming the environment and in particular without risk to air in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

The Planning Inspector John Woolcock also felt it necessary to comment on the objector's concern (including me) that CMBC has shown only limited understanding of the regulatory processes and that there is no evidence that CMBC has the technical expertise to regulate this facility. CMBC is the regulator for the proposed SWIP and has statutory responsibilities in this regard. He said Planning decisions should assume that the pollution control regime will operate effectively it seemed to him that the same assumption should apply to the monitoring and regulation of environmental permits. On the original application for an Environmental permit it states that CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time. This is now not included in the current application S13/006 which significantly removes CMBC's ability to monitor compliance in the operation of the incinerator.

In view of the stack height not changing and Inspector John Woolcocks decision, he said in his report "he was unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment". Then how is plausible for CMBC to grant an Environmental permit? The ADMS computer model does not use local weather data. The flow of the waste gases through the trees and valley cannot be accurately predicted by the computer simulation. An email response from the Met Office said they could not meaningfully assess conditions

within the Ryburn Valley. Meteorological convention would suggest that the valley would be prone to inversions/cold air pooling. If the Met Office is unable to calculate this, how is it that CVSH can with their software!

Calderdale Council (CMBC) states on their website 'Improving the environment in Calderdale is a priority for this Council. It is fundamental to our Vision 2024 ambition of the place we want to be in the future. We launched the Let's Clear the Air campaign to promote the work we are doing to protect our distinctive environment'. In January 2019 the Council declared a climate emergency and has recently updated the Air Quality Action Plan that shows how the Council is tackling air pollution. I wonder if this applies to the whole of Calderdale? Considering the Planning Inspector John Woolcocks decision and him being unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment then surely Calderdale Council has to refuse the application for an Environmental permit, (especially as the stack height remains the same).

Sincerely

XXXXX

675 I wish to object strongly on behalf of my family and other local residents likely to be affected by the above development. Health is a precious gift. Pollution is to be avoided at all costs. The situation of the incinerator in The Ryburn Valley and almost at the confluence with the Calder Valley would be very much against the health of future generations. The inspector last time made it crystal clear that there could be no variances as to how the emissions would disperse. Hence high risk to future health of local residents.  
XXXXX Number XXXXX  
Sent from my iPhone

676

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Sincerely

XXXXX

677 To Whom it may concern.

As residents of Sowerby Bridge we are writing to inform you of our concerns in relation to the above application. We live in a steep sided valley where concerns have already been raised in relation to the pollution caused by heavy traffic. If the application was successful an incinerator would certainly add to the existing problems and would have an adverse on human health and the environment.

We are also concerned that if it is allowed to build an incinerator that it would effect the value of our property.

Kind Regards

XXXXX

678 I am voicing my opinion on the waste incinerator proposal for Sowerby Bridge.  
My wife has Copd and struggles with her breathing. The pollution in Sowerby Bridge is already to high.  
Why would anyone want to create more pollution in the valley?  
This is clearly not the right place for the incinerator.  
XXXXX  
Sent from my iPhone

679 Regarding the ongoing fiasco over the Sowerby Bridge Incinerator planning application.....  
As we have every time this application rears it's ugly head we object totally to this application & will continue to do so into the future!  
Which part of The Community Do Not Want IT do the applicants & the Councils Planning Department not understand?????????????  
Please stop wasting any more public money giving this application the time of day!!!  
  
Yours sincerely  
  
XXXXX

680 Good morning.

This email is formal rejection and objection to the above application to install an incinerator in Sowerby bridge.

We are a relatively high earning, full time.working, young professional family. Our son attends nursery within half a mile of this proposed site. His younger sibling is due to join him there soon.

We love living in Sowerby bridge and although we could afford to move to a more suburban area out of Calderdale, we have valued our son's continuity of nursery.

If this incinerator is installed, this would change. We would move out of the area which would take our income out of the local economy. If you multiple the strength of our feeling across all the other objections, this is potentially £1000s removed from the local economy.

We are by no means no overly climate conscious - a totally typical hard working family. But the air quality in Sowerby bridge is questionable enough, without self sabotaging it even more.

Please support the many ordinary parents in your community, who want a healthy childhood for their children.

Many thanks,  
Concerned residents of Sowerby Bridge.  
XXXXX



As a resident in the Calder Valley, I wish to object to this proposal.

The site is located on the green belt, next to a river and is surrounded by trees in the bottom of a steep sided valley with weather patterns which do not lend themselves to easy dispersal of toxic emissions from the burning process. There are hundreds of residents including children and old people who live and work above the height of the proposed flue. The position of the site makes it very difficult for the toxins to disperse safely out of the valley.

I believe the information given about how much will be burnt in the incinerator is under-estimated, as to run it all day and all week it will take far more to keep it burning. The amount mentioned will be burnt in one day. This means that huge amounts of waste will need to be imported into the valley, in order to keep it going. This will increase the amount of HGV traffic through the valley, adding more toxins and air pollution to all roads through Calderdale. Every way into the valley takes traffic through congested areas where there are long holdups, and adding a regular run of waste lorries delivering waste to be incinerated will increase the congestion.

Sowerby Bridge is already horrendous to drive through and in my opinion this proposed incinerator will only increase traffic flow with more large vehicles coming and going from Calder Valley Skip Hire, therefore, increase air pollution which will be detrimental to health.

The waste is most likely to be not just inert soils and wood, but actually animal and poultry carcasses which will not be odourless at all. These will sit in queues of traffic filling the air around them with nuisance smells, and when burnt they will release toxins into the air, which is already very poor quality thanks to the traffic.

This location is not suitable for a commercial development such as this incinerator installation.

I'm not convinced that the emissions produced by the burning of waste on this site will be dispersed effectively because of the topography of the location, a steep sided valley, and that these emissions and the increase in HGV traffic to serve the new business will contribute adversely to the environment for visitors and residents of Ryburn ward and Sowerby Bridge which is already listed as an air quality management area.

I'm also worried about contamination of the watercourse which runs through this site. In the Boxing day flood of 2015, tonnes of waste was washed away in the river, there are no guarantees that this won't happen again, as flood defenses in this area are insufficient. Particles from incinerator ash would also make its way into the river due to wind and rain and, also on to the surrounding land from the particles in the air.

Sowerby Bridge is already recognised as being heavily polluted (one of seven areas in Calderdale listed as Air Quality Management Areas, being monitored for Nitrogen Dioxide output) and the council should be trying to improve that, not worsen the situation by giving permission to install incinerators.

To quote the council directly from their website - ""Air pollution affects amenity, environment, life and healthy life expectancy. Air quality is strongly linked to concerns regarding climate change, energy efficiency and sustainable development.""

Local residents are trying to make Sowerby Bridge a better place to live, work and visit, I believe the installation of an incinerator can only count against this. Who would want to live or visit a town knowing they're putting their health at risk by breathing in pollution. The council are busy promoting healthy and active living, and this should be considered before accepting this application. Residents and visitors would not want to take a walk along the canal or cycle through the valley and breath in pollution. The proposed Ryburn Valley Greenway Project is a fantastic idea, but it runs right behind the Calder Valley Skip Hire site so who would want to use it?

This site at Belmont Industrial Estate is close to residential areas, several schools, businesses and wildlife.

Smoke/emissions from a flue are not guaranteed to disperse from the valley given the steep sided nature of it and I am seriously concerned about the risk to health. There are numerous schools in the area, therefore, many children will to be exposed to additional toxic fumes from this incinerator. The site had a fire in January this year, showed how the smoke lingers in the valley, the smoke hung about for days and local school children in the valley were unable to go outside that day due to the heavy smoke lingering across the area.

This type of incinerator needs to be in a location where the air is moving is and is able to safely disperse smoke and odours over a wide area and in a variety of directions. The Belmont Industrial Estate site is at the bottom of the valley, and emissions can be trapped in the valley due to inversions especially during high atmospheric pressure

The additional noise caused by operating this site 24 hours Monday-Friday would be intolerable for local residents. The noises currently coming from the site during the day are bad enough, but to have that happen in the dead of night, when it's so clear sound travels for miles, would be unacceptable.

There's also the risk of water and land pollution. In the Boxing day flood of 2015, tonnes of waste was washed away in the river, there are no guarantees that this won't happen again, as flood defenses in this area are insufficient. Particles from incinerator ash would also make its way into the river due to wind and rain and also on to the surrounding land from the particles in the air.

In Summary

This site at Belmont is close to residential areas, several schools, businesses and wildlife.

Toxic emissions from burning process which would be hazardous to health of local residents

Pollution to land and waterways, spreading toxins down the Ryburn and Calder rivers

Air Pollution from emissions of vehicles transporting waste to the site along A58 and access roads leading to A58.

Additional traffic from lorries delivering waste to plant will add to congestion on the A58 through Sowerby Bridge &

Ripponden

Air pollution affects amenity, environment, life and healthy life expectancy. Air quality is strongly linked to concerns regarding climate change, energy efficiency and sustainable development.

The position of the site makes it very difficult for the toxins to disperse safely.

This site at Belmont is close to residential areas, several schools, businesses and wildlife.

Sowerby Bridge is already listed as an Air Quality Management Area and this facility will not improve the present situation.

This site is at the bottom of the valley, and emissions can be trapped in the valley due to inversions especially during high atmospheric pressure

The site is close to the Ryburn Valley Greenway Project and would have a negative impact on it's environmental and health improvement aims

Additional noise due to operating 24hours Mon-Fri

Calderdale is completely inappropriate for this type of enterprise.

I object both personally, and on behalf of the community because of the environmental damage this incinerator would cause.

Please do not put profit before people, reject this planning application

XXXXX

682 I would like to appeal for refusal of incinerator,for the health of local residents,we are trying to get sowerby to have better cleaner air and they want to burn waste in a populated valley bottom near schools and houses,when they had the fire we saw how the valley was affected,  
There have been reports done showing the negative effect this would have,hence the former applications being denied.  
Surely the health of locals should be put before business profits.  
Many thanks  
XXXXX

683 I absolutely object to the application (again) for the Belmont Group to open an incinerator. My objection is on the basis of safeguarding local residents from the extremely harmful effects of living near an incinerator.

I have lived in Kebroyd for 22 years with my family.

1. I am sure you are aware that Incinerators pump out toxic chemicals which are harmful to health and the environment. Burning waste, transforms it into toxic particles.
2. As the proposed site is in a valley, this is even more ludicrous. Toxic substances will be trapped down in the valley and breathed in by all of us,
3. Environment Protection Act 1990, Stockholm Convention, Human Rights convention need to be considered.

In a House of Lords enquiry on 14th April 1999, Environment Minister Michael Meacher said,  
“Incinerator plants are the source of serious toxic pollutants: dioxins; furans; acid gases; particulates; heavy metals; and they all need to be treated very seriously. There must be absolute prioritisation given to human health requirements and protection of the environment. Some of the emissions are carcinogenic...”

#### Health Effects of Incinerators

Numerous studies confirm that a typical incinerator releases a cocktail of toxic chemicals, including dioxins, lead, cadmium, mercury and fine particles, into the atmosphere. However, there has been little follow up investigation into the effects of these poisons on people near incinerators. Greenpeace has compiled a comprehensive review of all the scientific studies carried out on people living near to or working in incinerators. The report Incineration and Human Health contains some worrying findings, for example:

- \* A study conducted on 70 municipal waste incinerators in the UK operating between 1974 and 1987, and 307 hospital waste incinerators from 1953 to 1980, identified a 2-fold increase in the cancer deaths in children living nearby. These results were consistent with a second study showing increased child cancers for hospital incinerators and large scale, high temperature combustion industries (study dates 1998 and 2000).
- \* In 1996, a study on residents living in an urban area near an incinerator in Italy found a 6.7-fold increase in deaths from lung cancer.
- \* A study in 1989 on people working at a Swedish incinerator between 1920 and 1985 found a 3.5-fold increase in deaths from lung cancer, and a 1.5-fold increase in deaths from cancer of the oesophagus. The same study also found an excess of ischemic heart disease, especially in workers with more than 40 years

I also believe that Sowerby Bridge is struggling with “Clean Air” already.

Let's see people being accountable

XXXXX

684 I, XXXXX of XXXXX, Sowerby Bridge formally object to the latest Calder Valley Skip Hire Permit Application for a Small Waste Incinerator Plant (SWIP) in Sowerby Bridge ref. S13/006

I object for the following reasons:

1. An original SWIP Permit application (APP/EPR/603) was turned down in 2018 on the basis of insufficient evidence to guarantee air quality for residents and surrounding businesses, in that it could not be guaranteed that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.

2. A virtually identical Permit application of August 5th 2020 SWIP was refused at appeal on the 5th July 2023 by Government Planning Inspector John Woolcock. The Government Planning Inspector refused a permit stating he was “unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”

3. The virtually identical Permit application of August 5th 2020 SWIP (refused at appeal) totally relied 100% on an ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools.

4. The current new application ref. S13/006 of Feb 20th 2024 relies totally 100% on the same ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools.

5. The current new application ref. S13/006 of Feb 20th 2024 has the same height and size of waste gas exhaust

discharge stack and appears to be a resubmission of the application dated Aug 5th 2020 but with added information stated as an 'independent review' by RPS on behalf of CVSH. The independent review was done by CERC (Cambridge Environmental Research Consultants) to verify the treatment of trees within the air quality assessment by RPS.

The review should not be taken into consideration and the permit application should be refused as it does not contain an "independent" review. CERC are the producers of the ADMS air modelling software that RPS used for this application. CERC have a vested interest in not showing up problems with their software or upsetting their customers (CVSH).

The CERC report should be disregarded as unreliable in that it stated that 'the approach adopted within the air dispersion modelling is considered appropriate and there are no other suitable models/software available'; when this is not the case and other suitable models/software are available.

6. The ADMS computer model data put forward in the permit application is not fit for purpose in that it has seriously not taken into account the effect of the specific weather condition of inversion in a valley bottom; it has only taken into account the condition of inversion with regard to weather data programmed for the flow and dispersion of waste gases from a hill top exhaust stack as located at Yeadon Airport.

Inversion being deviation from the normal change of an atmospheric property in comparing the flow and dispersion of waste gases from a low valley bottom in close proximity trees and buildings, with the high altitude of an open hill top site as per weather data used for the permit application submitted.

As the application for the Permit relies 100% on the computer model, the permit application should once again be refused as being incorrectly assumptive and as such inaccurate in not taking into account the site being located in a valley bottom with a history of detrimental inversion.

As such the ADMS computer model data as submitted is unsafe in its attempt to guarantee safeguarding of human health and the environment.

7. The proposed Incinerator site and waste exhaust fume plume smoke stack is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2) and is identified as subject to a Council and local Environmental Health initiative to improve the air quality.

The permit should be refused given the historic evidence of smoke and low cloud hanging in the valley bottom due to the unique terrain which is the exact opposite of the computer model figures from Yeadon Airport, the waste exhaust fumes



from the proposed smoke stack would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

8. As the proposed Incinerator site is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2), the additional travel to and from the site through Sowerby Bridge of extra diesel fuelled waggons transporting 2 tonnes per hour (Monday to Friday for 52 weeks per year) and then re-transporting away the non-combustible waste to landfill; would in the first instance further add to the already damaging traffic congestion and in the second instance damage even further the air quality of Management Area, (AQMA2)

The permit should be refused as the extra traffic throughput, poisonous exhaust fumes and congestion would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

9. With regard to monitoring; the August 2020 CVSH permit application states "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time."

The January 2024 application by CVSH should be refused as CVSH have removed the statement "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time."

The Permit should also be refused as there would be a restriction if not an impossibility for CMBC to continuously monitor emissions to air in order to confirm that levels are within IED emission limits, given the removal of the power of CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time.

As such the permit application does not fulfil its obligation in guaranteeing that necessary measures will be taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

10. The new application report dated 26 Jan 2024 submitted by RPS on behalf of CVSH states that the refusal at appeal decision by Government Inspector John Woolcock is "perverse" and "procedurally unfair" but yet did not take up their option to take it to Judicial Review.

The permit application should be refused as it appears both perverse and procedurally unfair of CVSH in submitting what they state is basically the same application as in 1.5.5 in the new application report.

The permit application should furthermore be refused as it appears to be abuse of process by CVSH in not taking their option to take the original appeal decision to Judicial Review, but alternatively submitting what CVSH state is basically the same application on 20th Feb 2024 as was refused some 7 months later on 5th July 2023 by Government Inspector John Woolcock.

Summary

A. A previous permit virtually the same as the Feb 2024 application which included provisions for CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time, was turned down in 2018 on the basis of insufficient evidence to guarantee air quality for residents and surrounding businesses, in that it could not be guaranteed that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.

B. A previous permit virtually the same as the Feb 2024 application which included provisions for CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time, was refused at appeal by an independent government officer on the 5th July 2023 by Government Planning Inspector John Woolcock who stated he was “unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”

The latest application dated Feb 2024 is essentially the same application as the one turned down in 2018 and virtually the same as the one refused at appeal on 5th July 2023 but with s CVSH have removed the statement “CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time.”

### Conclusions

Firstly the latest permit application should be rejected as it still categorically fails to guarantee that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.

Secondly the latest permit application should be rejected as it still categorically fails to guarantee that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”

Thirdly the latest permit application should be rejected as it would essentially allow CVSH to pump waste exhaust gases at the rate of burning two tonnes per hour into the environment 670 m from nearby Air Quality Management Area 2 Monday to Friday for 52 weeks per year and now without the power of any Monitoring from Calderdale MBC

Yours faithfully,

XXXXX

Sent from my iPad

685

To add further weight to this article, at a recent meeting I attended, XXXXX from UKWIN, and former MP for both Selby and Keighley, explained that for every tonne of refuse derived fuel (RDF) burned it creates a tonne of CO<sub>2</sub>. He also proved that the UK already has more than enough incinerator capacity for current needs and there will be over-capacity in the future as we strive to reduce carbon emissions and recycle more. Scotland and Wales have already instigated a moratorium on any new incinerators. UKWIN, which is a cross party group, are campaigning for the same in England. Regionally we have the bizarre situation where Bradford and Sheffield have ULEZ zones to help reduce emissions but at the same time there are 10 applications for new incinerator sites across Yorkshire and the Humber. Over the Pennines, Greater Manchester is also considering a ULEZ zone, meaning that Calderdale could soon be sandwiched between ULEZ zones. In 2009 in a study by XXXXX, a retired civil servant from XXXXX, he found that infant mortality rates in the wards surrounding municipal waste incinerators were above average. XXXXX a writer and journalist has written widely on this subject and in 2020 he reported that XXXXX had calculated that the early deaths of about 70 infants annually can be attributed to pollution from waste incinerators. In the article from the Guardian above it concludes that incinerators do increase particulates in the atmosphere, and they do impact on the health of people nearby, they also conclude that it is poorer residential areas that bear the brunt of these facilities. One wonders if this application would have got this far if Sowerby Bridge was more affluent? All the above illustrates the folly of allowing the operation of an incinerator in Sowerby Bridge, not least because it's been found that they tend to encourage more, not less, rubbish to be burned. Now I would like to object in the strongest terms to this latest application for an Environmental Permit to operate an incinerator in Sowerby Bridge:

#### 1. Site Suitability

A Government Inspector, John Woolcock, appointed by the Secretary of State for the Environment has already decided that this site isn't suitable. Only eight months ago he refused an almost identical application to this and said he was "unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment" Nothing in this new application is significantly different to call it a "new application" in fact RPS say in their supporting documentation "this application is submitted on the same basis as before". A bit of extra data modelling supplied cannot be allowed to overturn the thorough deliberations of a very experienced and learned inspector. Again, in their supporting documentation RPS say that John Woolcock's decision was perverse and procedurally unfair. If they really thought that was the situation then they should have chosen to take their case to a Judicial Review. The fact that they didn't suggests that they don't have a strong case. The proposed site is situated at the bottom of a narrow, deep steep sided valley 600 feet high surrounded by tall trees, but it is very near to the considerable residential populations and schools of Sowerby, Sowerby Bridge and Norland. Calderdale Council (CMBC) originally refused planning permission for an incinerator at this site, which was a wise, common-sense decision. But once the incinerator had been approved by a planning inspector (on appeal), wrongly in my opinion, the council officer's

common-sense has disappeared. It seems to me that because of previous experiences in dealing with Calder Valley Skip Hire (CVSH), the council officers, (both legal and environmental) have become more concerned about potential litigation from them, rather than the health and safety of the residents of Sowerby Bridge and the Ryburn Valley. The reason I say this is because the council officers have twice supported EP applications for this site. Firstly, they approved an EP, but that was overturned at a Judicial Review because CMBC had errored in the legal process. Secondly, at the appeal hearings for a resubmission of the EP, CMBC employed a barrister who appeared to agree with the appellants barrister against the many objectors who attended. CMBC accepted the appellants modelling statistics etc. rather than listening to the valid concerns that were being raised by local residents. This was evident when I challenged CMBC's barrister, XXXXX. I asked why CMBC were supporting CVSH and not the residents, and why they weren't challenging assertions made by the appellants statistics. He said he "had no reason to question the veracity of their figures". Thankfully John Woolcock did challenge the veracity of their figures and refused their appeal. Now CMBC are allowing CVSH a "third bite at the cherry". Most, if not all, incinerators are built on flattish terrain, or better still on raised ground, usually with very tall chimney stacks, so that emissions (that are poisonous) can easily be dispersed into the atmosphere away from people. The problem with an incinerator at the bottom of a valley is that the poisonous gases pass by roads, people's homes, schools, workplaces etc on their way into the atmosphere. It is rather telling that the no-one seems to be able to give an example of an incinerator that is in a similar location to Belmont, which is why the applicant has been so keen to rely on modelling rather than reality. However, we have the experience of those who know and love the Ryburn Valley to challenge these models. Inversions are a regular occurrence in this valley, and they hold gases down in the bottom of the valley for hours, if not days sometimes. Ironically there was one on the first day of John Woolcock's hearings at the Piece Hall (photos can be provided). When CVSH had a large fire in 2017 smoke hung around in the valley for days (photos can be provided). Even the Victorians knew about the issue of dispersing smoke in the valley, ¼ of a mile upstream from CVSH was Mill House Mill. To disperse smoke from the mill's steam engine they built a flue that went up the valley side then under Rochdale Rd. to a tall chimney stack at the bottom of Lower Brockwell Lane. It was known locally as the Long Chimney. There is a cutting below from the Halifax Courier from 1950 showing it. If these aren't enough reasons to doubt their modelling, then consider this comment made by a senior data analyst at the Meteorological Office, when he was asked about weather conditions at HX6 3LL he said "That is a very narrow, deep valley....we could not meaningfully assess conditions within that valley. Meteorological convention would suggest that the valley would be prone to inversions/cold air pooling". This means that dispersal modelling provided by the applicant is meaningless. The dispersion of gases from the stack are the main issue here, John Woolcock has already said dispersion will be impaired because of the trees, but I haven't seen anywhere how dispersion can be safe when we have an inversion that holds gases within the valley. The public opposition to the proposed incinerator site is incredible, 1000+ people signed a petition against it, all the councillors for Ryburn, Sowerby Bridge, and Greetland & Stainland (9 in total

from 3 different political parties) are against it and both our local MP's Holly Lynch (Lab) and Craig Whittaker (Con) are against it. Even the environmentalist XXXXX is against it! (evidence can be provided) Many of them, including XXXXX, say that they aren't against incinerators in principle, but that the bottom of a narrow, deep, steep sided valley just isn't the right place. In fact, ask any person in the street and they'll tell you it isn't the right place. People in the area are rightly sick and tired of this whole process that's been going on for 8 years, but at short notice over 100 local people attended a public meeting at Foundry Street Community Centre in Sowerby Bridge on Saturday 23rd March 2024 and they vowed to carry on the fight against the operation of this proposed incinerator. Over 30 people protested outside the Town Hall on Wednesday evening 27th March 2024 to make their feelings known to the council's Climate Change Action Group. All these people cannot be wrong. CMBC by continuing to tacitly support this application are defending the indefensible, they should have no fear of litigation, because right minded Judges listen to common sense and make right minded judgements.

## 2. Modelling

Modelling is what it is, a model, it is hypothetical, theoretical and abstract, it is not real. The applicant's models all seem to indicate that the impact of this incinerator on the local environment are "negligible". Well, they would say that wouldn't they, they are hardly likely to produce models that show it in a bad light, and besides which those modelling companies will have been paid handsomely to come up with the right answers. Now that we have a definitive statement from the Met Office saying that it's impossible to model weather conditions at this site and that it is very probable that the site would be prone to inversions, CMBC can no longer rely on models that have been using weather data from Leeds-Bradford airport or Bingley, they will not be a reliable or accurate representation of the Belmont site. At the end of the day modelling is not an exact science and no-one can guarantee that these models will reflect reality, especially in this location. Because of the location, poisonous gases that are harmful to human health will be passing by people on roads and in homes, schools and workplaces, so I urge CMBC to listen to the public and err on the side of caution and refuse this application.

## 3. Impartiality/Decision Making Process

Because we have evidence that CMBC officers have always seemed to be minded to approve an EP here, I do not believe it is fair for them to continue to be involved in the process. At every opportunity they have dismissed valid concerns from their many residents about the human health implications of allowing incineration of RDF at this site. Whilst they now say they are bringing in a company called Bureau Veritas to do some more modelling, I am distrustful about the brief that Bureau Veritas will be given (e.g. will it be "come up with some data to back up CVSH's models"). You have my thoughts on modelling above, but why do CMBC need more modelling anyway when a higher authority (the Planning Inspectorate) has already ruled on this? We also now have the Met Office confirming it's not possible to model weather conditions at this site.

Finally, we have the lived experience of Calderdale residents who know the valley – that is reality. As mentioned above all these objectors cannot all be wrong. An independent “fresh pair of eyes” needs be brought in that will properly listen to the concerns of objectors and the final decision made by another body, e.g. The Planning Inspectorate.

#### 4. CO2 and Air Quality

CMBC have accepted that there is a climate emergency and created a working group for climate change action. I attended their most recent meeting on 27th March 2024. The whole meeting was about how Calderdale should reduce its CO2 levels and improve its air quality. If CMBC have agreed that there is a climate emergency, how on earth can they approve an incinerator that will produce 10000 tons of CO2 per annum? It just doesn't make sense. Similarly, if CMBC are committed to improving air quality how can they approve an incinerator that is just half a mile from the centre of Sowerby Bridge and only 670m from the start of the towns Air Quality Management Area (AQMA). Waste incinerators contribute a considerable level of pollution especially to the area immediately around them. The smoke produced during the burning process may include acid gases including but not limited to the carcinogen dioxin, particulates, heavy metals, and nitrogen oxide (NOX). These gases are poisonous to the environment. Dioxins are produced when burning RDF the World Health Organisation say “Dioxins are highly toxic and can cause reproductive and developmental problems, damage the immune system, interfere with hormones and cause cancer” Given that there are 12 schools within 2 km of the site, that should be a great cause for concern to us all. John Woolcock stated, “I am unable to find that waste gases from the SWIP would be discharged in a controlled way...as to safeguard human health and the environment”. One thing that is certain about the operation of this proposed incinerator, it won't make the air quality better. Given that this area was and still is still blighted by poor air quality we shouldn't be allowing the progress that has been made so far, to be reversed. Additionally, there is the issue of inversions, mentioned above, they occur in the valley regularly and they will concentrate and hold poisons in the atmosphere of the valley for prolonged periods. I also learnt from the climate change action group meeting that last year Calderdale had 6000 hospital admissions with respiratory illness of which 1000 were children. There was also an estimate that c100 people die each year in Calderdale from poor air quality. Lung disease is notably higher in Calderdale than in the rest of West Yorkshire and around 4.5% of all adult mortality in Calderdale is estimated to be due to the long-term exposure to harmful particulate pollution. When CMBC refused a similar application for an incinerator at Mearclough in 2018 the reasons for refusal stated: “It is accepted that there is no safe level of NOX, and it is accepted that the site could impact on the AQMA. The application does not provide reasonable grounds to believe that it will not lead to an increase in NOX levels within the locality, but again there is no certainty that any action could be taken in the event of a breach” The Belmont site is equidistant to the Sowerby Bridge AQMA and therefore this statement applies equally to the current application as to the former, in fact the Belmont location is worse because the prevailing wind will blow emissions from there towards the AQMA.

#### 5. Waste Composition and Handling



The combustion modelling put forward is based on a typical RDF waste composition. This requires careful sorting and segregation which relies upon human intervention to obtain a correct mix. In a real-life situation, the RDF will have variations that make the combustion model invalid. These variations could include hazardous materials missed in the sorting process such as lithium batteries that can be very dangerous if inadvertently incinerated. John Woolcock concluded “I am unable to find that the necessary measures have been taken to ensure that waste management would be carried out without endangering human health, without harming the environment and in particular without risk to air in compliance with Article 13 of the Waste Framework Directive 2008/98/EC”

#### 6. Noise nuisance for nearby neighbours

Many properties on the hillside above CVSH are listed buildings and must retain single glazing to comply with planning regulations. It worries me that 24-hour operation will mean that during the night noise will be heard from the machinery used to feed the incinerator and/or remove ash. 1-2 tons per hour is a considerable amount of waste to move. The noise might also be worsened if ventilation is required in the building to let heat escape – either because more noise will escape from the building through open vents or because fans are required. Additionally, the valley amplifies sound as is evidenced by people who live at the top of Woodlands, Triangle, some distance away, being able to hear the 24-hour machine noise which comes from the factory next door to CVSH (Rosehill Polymers). And by the “wake up call” we get every Wednesday morning at 7.30am when CVSH use a road sweeper to clean their site for an hour – it is incredibly noisy, and we are XXXXX. The impact of cumulative noise at night (including Rosehill Polymers) needs analysing. Supporting documentation from CVSH says that they will curtail noise “where practicable” – I’m afraid that just isn’t good enough. Also, their modelling of noise is completely unrealistic, an increase of just 5db (that’s like a whisper) isn’t feasible when you consider all the working parts involved and logistical movements across the site.

#### 7. Applicants Suitability

I have heard anecdotally a lot of allegations about the suitability of CVSH to operate the proposed incinerator, many of which were aired at the appeal meeting at the Piece Hall. Notwithstanding those, there seem to be some facts that we do know that would call into question the applicant’s suitability to run the operation, especially given that they have no previous experience in operating an incinerator. It seems to me that the primary motive for this incinerator is profit for the applicant i.e., cutting the costs of sending the waste to landfill (or incineration elsewhere) and energy saving from the use of waste as fuel. Why should the profit motive of one limited company come before the health and environment of the local population? Given that the company by now must know the very strong feelings locally against this, why would they press on regardless, especially after a final decision was made last year by the Planning Inspectorate? That is not a neighbourly thing to do. Would a respectable company use bullying and litigious tactics like sending threatening legal letters to members of the CMBC Cabinet as happened in February 2021? Running an incinerator correctly and safely requires a company to have the right attitude – I do not believe this company has shown that in its dealing with the public



or the council. As well as poor attitude we also have evidence of incompetency as follows:

- 1) Wrong site plan submitted with their first application for this EP
- 2) Not running the EP application alongside the planning permission
- 3) Installing the Incinerator before getting the EP
- 4) Using the wrong postcode (HX6 3BL rather than HX6 3LL)
- 5) Original stack height calculations 9 metres adrift
- 6) In the current application the rate of incineration is shown as 2kg/h when in fact it should read 2000kg/h
- 7) The awful smell in 2015
- 8) The large fire in 2017
- 9) The fact that their appeal was turned down partly because they hadn't addressed waste management processes satisfactorily which is fundamental.

This list is not exhaustive, I am sure you will get more examples in other people's objections. If CVSH can get all these basic things wrong, how on earth can they be expected to run an incinerator safely?

Finally, it is the people of Calderdale (me included) who have helped keep CVSH in business all these years and you can't help but think that they are "biting the hand that feeds them".

#### 8. Inability to Enforce Permit Conditions

This application would be governed by two separate permits, one relating to the SWIP and the broader Environment Agency permit. When CVSH applied for a permit at their Mearclough site, CMBC's Cabinet refused this, citing "concerns about the enforceability and any related concerns in a situation where operations on the site are governed by two separate permits. Having considered both legal advice and information from DEFRA, it is concluded that there is insufficient certainty about the ability of the council to enforce permit conditions...". This argument applies equally to the situation at Belmont, and therefore the application should be refused. Another point linked to this is the comment by John Woolcock that objectors were concerned that CMBC had shown only limited understanding of the regulatory processes and that there was no evidence that CMBC has the technical expertise to run this facility. I believe this is still true and made worse by the fact that local government resources are stretched more than ever due to central government cutbacks and recent rampant inflation.

#### 9. Technical Issues

XXXXX mentioned many valid technical issues at the hearings, John Woolcock said he did not need to rule on them because he had already refused the permit for other reasons. However, these technical issues would now need to be properly explored if CMBC are to decide on this properly. I am not a technical expert, but it does seem to be a jumble of all sorts of bits of equipment squeezed into an existing shed in a very "Heath-Robinson" manner.

#### 10. Flooding

The incinerator building is situated at the very bottom of the valley almost in the river Ryburn, the flood risk at this site is high for surface water and medium for river flooding. With global warming the risk of flooding here is more likely than ever. Sowerby Bridge suffered a serious flood in 1968 but recently it has had serious floods in both 2015 and 2020 – a 50 year event might now become a 5 year event. Flooding at this site would be very serious because RDF or ash washed into the Ryburn would then flow into the Calder half a mile away which is already one of the most polluted rivers in the country.

#### 11. Risk Assessment

The building intended for the incinerator is squeezed into a congested site alongside the river Ryburn – there are risks associated with this – flooding, fire and the health and safety of those working within the plant being just a few. Given that the gases that are emitted from the stack are extremely dangerous to human health and the environment, and that there are so many things that can go wrong regarding the running of the plant, a full and proper risk assessment should be carried out by CMBC including the items mentioned above but also including dispersion of poisonous gases, treatment of inversions, competency of CVSH and its staff, CMBC's ability to regulate and enforce, RDF composition, Equipment installation, failure etc.etc. Without a thorough risk assessment, I don't see how anyone could properly approve this permit, the dangers to the public and the environment from the gases emitted are too great.

#### 12. Personal Health

I have read that the communities where waste incineration plants are built are at a higher risk for long-term negative health effects such as cancer, birth defects, reproductive dysfunction, neurological problems, and other health effects that are known to occur at very low exposures to many of the metals, and pollutants released by incineration facilities. Respiratory problems, increased cancer rates, reproductive abnormalities, and other health effects are common in areas where incinerator plants are built. The leftover ash contains several poisons and heavy metals which require further treatment. If not disposed of correctly, it can cause serious harm to the public and the environment. I am not convinced that the applicant has properly considered the impact of emissions (especially particulates) on the health of those living close to the incinerator such as those with asthma. The mental health of local residents will also be impacted – seeing emissions spewing from the plant 24 hours a day, right under their noses, will make people anxious, wondering what on earth is being burned and if it will damage their health. It will make people think twice about using their own gardens for fear of inhaling fumes. This company shouldn't be allowed to spoil the enjoyment of residents own outdoor space. If noise from the plant during the night keeps residents awake, then that too could impact on both their physical and mental health. Finally, for those people who live on the main road opposite the site, the top of the stack will be blowing out at their level 24 hours a day, this is not reasonable especially given the extra noise they will be subjected to. As I said earlier, CVSH do not exude neighbourliness.

#### 13. Sowerby Bridge Environment

Sowerby bridge is already a frantically busy little town that is blighted by pollution of all kinds, as mentioned above it is an AQMA. It sits at the confluence of 2 rivers (the Calder and the Ryburn), I found out at the climate change action meeting that the Calder has just been promoted from the 2<sup>nd</sup> worst to the worst polluted river in the country. The single carriageway A58 trunk road from Halifax to Ripponden, the M62 and Rochdale runs through the centre of the town and there is a virtually permanent queue of traffic between West Street and Tuel Lane. At rush hour the traffic sometimes backs up much further and when there is an incident on the M62 it can back up past CVSH as it did on 23<sup>rd</sup> March 2024 (photos can be provided). As well as through traffic there are a huge amount of local journeys due to all the services being concentrated in and around the town centre – two large secondary schools, one at each end of the town and their associated school buses twice a day, 6 primary schools, 2 day nurseries, 3 supermarkets (including a Tesco Superstore), a Leisure Centre (now much busier because there are no council facilities in Halifax), a Railway Station and a Household Waste Recycling centre. Plus, there are several factories, shops, surgeries and hairdressers etc. etc. Sowerby Bridge is at the junction of 2 canals, it has a busy canal basin with many diesel engined narrow boats. All of this probably explains why Sowerby Bridge is an AQMA, but it also makes the town feel very congested. The town also has a vibrant nightlife with dozens of pubs, restaurants, bars and take aways. Consequently, the above activity creates a lot of litter. To try and improve the town's environment a group of voluntary litter pickers have formed called "XXXXX" between them they collected a total of 135 sacks of litter from the streets of Sowerby Bridge in January 2024 alone. (Evidence can be provided) What I am trying to explain is that Sowerby Bridge is already too busy and polluted to take any more – AQMA, traffic congestion, worst polluted river and a litter mountain, one absolute fact is that the incinerator won't make it better. At the climate change action group meeting they agreed that focussing on one type of pollution e.g. either air quality or CO<sub>2</sub> shouldn't be the way forward, there should be a holistic approach – that holistic approach could start here by not allowing a permit to pollute further in Sowerby Bridge.

#### 14. Sowerby Bridge Woodland

Sowerby Bridge lacks places where you can walk to "get away from it all", but probably the nearest place to get into the countryside from the town centre is the woods that surround the CVSH site and stretch as far as the village of Triangle and up to Norland. These are lovely woods, a dingy dell with several paths that connect Sowerby Bridge with Triangle. There is also an old derelict railway line in the woods that you can walk along to see some interesting old railway architecture and hand-built railway cuttings etc. These woods are the "lungs" of Sowerby Bridge and should not be contaminated with incinerator smoke. It is a rare amenity that shouldn't be spoiled. The trees surrounding the incinerator site are all protected by TPO's (tree preservation orders) and are very important because they help to link together 4 protected ancient woodlands and form part of Calderdale's Wildlife Habitat Network. NO<sub>x</sub> is bad for trees and therefore an Arboricultural Impact Assessment (AIA) that analyses the impact of the stack and its emissions upon the adjacent woodlands needs to be carried out. I don't believe this has been done here to meet the requirements as set out in BS

5837:2012 of an AIA.

#### 15. Public Footpath

There is a public footpath that leads to the woods from Rochdale Road that goes straight through the middle of the CVSH site – in between the Waste Transfer Station and the proposed SWIP building. I am very concerned about the public's health and safety when traversing the site if this permit is approved, because there would be much more activity by CVSH moving RDF from one side of the site to the other across the footpath.

#### 16. Sowerby Bridge Regeneration

One of the reasons for "XXXXX" is to help Sowerby Bridge regeneration and to make it an attractive place to visit. Some years ago the two canals were re-connected and the deepest lock in the country was built at the bottom of Tuel Lane. The canal basin has been developed and is busy with narrow boats to hire from Shire Cruises, plus tourists visiting in their own boats. More recently Government grants have been used to renovate the old town hall and the pavements surrounding that, and CMBC intends to create a "town square" on Wharf St. which is, incidentally, downwind from the incinerator. There have also been smaller scale community projects to regenerate old buildings such as Foundry Street Community Centre, The Puzzle Hall community pub and music venue and the Fire and Water project which is hoping to bring the old Edwardian council offices, swimming pool and fire station back to life. A privately funded project on the edge of town, costing millions, is the renovation of the Haugh End Estate, bringing a collection of derelict grade 2 and 2\* listed buildings back to life as 10 homes. So as we strive to make our town more attractive it is rather ironic that as visitors approach from the west they could be met by a plume of incinerator smoke..."Welcome to Sowerby Bridge"!

#### 17. Sowerby Bridge Historic Conservation

Following on from the above, the Haugh End estate that I mentioned contains some quite significant buildings in the history of Sowerby Bridge. One house is probably one of the oldest in the borough – Old Haugh End Cottage dates from 1528 and is the birthplace in 1630 of one of Sowerby Bridge's most famous sons, XXXXX, who became Archbishop of Canterbury in 1691. Next to the cottage is the grander, Georgian, Haugh End House, built by the famous architect XXXXX. It became home to the wealthy XXXXX of Halifax who featured in the drama Gentleman Jack. Both the cottage and Haugh End House were used in filming the programme. CMBC rightly deemed these buildings so special that in the local plan they have designated the fields in front of the properties are not to be developed so as to maintain their setting. Again, it is rather ironic that if this application is approved the setting of these special buildings will be blighted by a plume of incinerator smoke just 230 yards away. I think CMBC's conservation officer should be consulted on this.

#### 18. Conclusion

In conclusion I would respectfully urge CMBC to reject this and all future applications for an Environmental Permit on the following grounds: A decision has already been made by the Planning Inspectorate for this site. CO2 – Help fulfil CMBCs Climate Change objectives. Impact on the Sowerby Bridge AQMA Location – Met Office confirm weather conditions can't

be modelled here so dispersal of gases safely out of the valley bottom can't be guaranteed with the added risk from inversions and floods. Applicant's suitability Inability of CMBC to Enforce Noise at night and the health of residents living near to the plant Preserving Sowerby Bridge's overall environment, woodland, historic conservation and future Upholding local democracy (adhering to the wishes of the residents, councillors and MP's of the area) Ultimately this is all about the quality of life for the people of Sowerby Bridge, we have a right to breath clean air and as XXXXX said at the last full Council meeting it is the council's job to make people's lives better. This incinerator won't make our lives better. Please, before you decide on this application, I would urge you to take a fresh approach and introduce an independent arbiter who will engage properly with the local residents. XXXXX

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REF S13/006

The government's planning inspector John Woolcock refused this application. He is the highest authority in the land.

How can you possibly be reconsidering it?

This is a quote from Sally Ellis, Met Office

Meteorological convention would suggest that the valley would be prone to inversions/cold air pooling. Totally the wrong site for an incinerator.

I live close to CVSH (since before they took over this site), down wind of the proposed incinerator, my property is above the top of the proposed flue, fumes will be blowing straight into my home, I will have to have the doors and windows shut all year round.

CVSH cannot even manoeuvre lorries on the road without damaging the 30 mph sign, how can they be trusted to run an industrial incinerator?

The modelling of air pollution does not satisfactorily represent the conditions in the valley even with rough surface calculations. The stack height is low, the point of emission is near level with the houses on Rochdale Road and the mixing of air / dilution of pollution at the point of emission is unknown. There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on 1 particular model which does not allow for the topography, the woodland, the inversions in this valley.

Each report for air quality, uses terms like, estimates, projected, calculated based on a model of air distribution at Leeds airport. Some parameters have been set with the agreement of CVSH which is inappropriate. The valley suffers from inversions which will keep the pollution in the air that we breathe at low levels. The stack height should be much higher in this location.

Is it really acceptable to allow a risk to human health levels of dioxins and furans are predicted to be higher in the area and yet these are only estimates. On this basis alone the permit should be refused. The flue is not high enough to achieve dilution - the risk to human health has not been adequately determined and the effect on human health will be SIGNIFICANT.

The addition of this significant number of emissions to the atmosphere will impact on air quality within the boundary. The data provided by the applicant shows much higher pollution levels at Spring hill mills area, this is due to prevailing wind conditions. Pollutants when they are able to disperse in the winter months will likely blow into the AQMA having a seriously detrimental impact on air quality within the AQMA and surrounding areas.

The original submission suggested that there won't be an increase in waste transfer in or out of site. This is incredulous. A business will operate to achieve maximum profit. It is profitable now bringing in waste sorting and moving waste to landfill. This operation will continue and the site will take in more waste to burn - numbers of vehicles to site will likely double if not triple. The effect on the AQMA will be SIGNIFICANT.

The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door opens for much of the time impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that during the day but especially at night.

Much has been made of the trees which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact of hot gases on these trees, how these harmful chemicals will affect the local ecology? Deer roam the woods, badgers, cuckoos, the woods are alive with birds and animals, how is nature to be protected. The flue is not high enough to allow gases to escape and the environment will be harmed.

CMBC have insufficient resources to ensure adequate enforcement, a severe lack of specialists to deal with such a site, and there is also an apathy towards enforcement. The Authority has been threatened with litigation by CVSH, how can they then take enforcement action against them now?

As the company will want to make profit, it is likely (more than likely) that they will want to extend operating hours which will further impact on the matters raised above.

#### REFUSAL ON THE GROUNDS:

Inadequate dispersal and dilution of chemicals which are harmful to human health.

- \*The Stack height is inadequate

- \*Dilution is negatively affected by the location of the of the plant in the valley bottom

- \*Dispersal is negatively affected by the location of the emission point of the flue

- \*Dispersal is negatively affected by the trees

- \*Dispersal is negatively affected by inversions

- \*Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology.

THE PERMIT SHOULD BE REFUSED

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Dear Council Officers

When the application for the incinerator was first submitted I wrote a letter to CMBC objecting on health of the community grounds. Nothing has changed. The steep-sided nature of the Ryburn Valley means pollutants are likely to be trapped within the valley - and not just pollutants from the incinerator but also emissions from the increased number of large vehicles which would be servicing the site.

Noise pollution could also be a problem but primary consideration should be given to the detrimental effect on air quality and the adverse impact of that on the health of residents and the local environment.

On these grounds I trust that the application will be refused.

Kind regards

XXXXX



688 Dear Community Safety Team,

I am writing with regards to the proposal submitted by Calderdale Valley Skip Hire to build an incinerator in Sowerby Bridge.

In short, I am dismayed by this proposal and I am deeply upset this idea - an idea already rejected as clearly unsuitable. I stand with many other local people who live, work, and breathe in Sowerby Bridge who wholeheartedly and clearly object to this proposal.

I appreciate your team are busy and have a lot of important work to balance, so I am summarising my points below:

1. Perhaps the most essential point here is that we are in a climate crisis. Every single day there is more and more worrying news of increasing temperatures, loss of habitat, rising water levels, and pollution. We continue to miss climate goal after climate goal and it is simply not good enough to avert disaster. It is not good enough to form half-baked plans lacking in risk mitigation that fail to consider the long term or the big picture. Instead of polluting our skies and lungs 24/7 (as this incinerator would) we need to be investing in sustainable solutions that will benefit real people for generations to come - not the financial interests of businesses / companies.
2. I, and many others, am proud of Sowerby Bridge as a real jewel in the emerald crown of Calder Valley. It is a genuinely beautiful area where nature is, so far, prospering in an era where local and large-scale government seem determined to stamp it out. It benefits from well-maintained canals and waterways, the Calder Valley Cycle Way, Norland Moor Nature Reserve, Milner Royd Nature Park, Norland Moor itself, and of course the surrounding hills, woods and valleys which make Calderdale what it is. We should not and cannot risk these precious assets which generations before and after us could treasure.
3. There will be a drastic impact not just on the environment around Sowerby Bridge, but also the rest Calder Valley. Not only will the pollution drift across multiple areas, thus ruining the air quality and health of those living there, it will also have an impact on the water quality in the rain, local crops, and contaminate the interconnected water ways stretching through Halifax, Hebden Bridge, and beyond.
4. The main road through Sowerby Bridge is already very busy and those around it already have to breathe exhaust fumes and smoke. This is unavoidable in a society so dependent on cars, but we must not add to it any further. In fact, we should be looking for ways to improve the air quality and protect the environment.
5. It is also grossly unfair to allow one particular business and its owners to prosper at the expense of an entire community of hardworking locals, many of which own independent businesses seeking to help the community, provide

wholesome food, improve people's health, or otherwise provide vital services such as the cafes, the leisure centre, the community centre, and charity shops. Why should they suffer and struggle so one can make money off of polluting the very air we breathe? Why should the innocent children attending local schools and nurseries be forced to play outside inhaling pollution and chemicals, at the risk of their long term health?

6. Sowerby Bridge has a rich culture and history, and often attracts visitors from other towns and cities who come to appreciate the views, nature, and independent businesses. It would be a real shame to lose all of this good name and renown, and instead be known for dirty water, polluted air, and the smell of burning rubbish 24 hours a day.

7. This is a particularly foolish and dangerous idea in a supposedly post Covid-19 society. Many people still struggle with respiratory issues and long Covid syndrome who will no doubt suffer further should this go ahead.

8. We now live in a society and era where people work longer and longer hours stuck behind screens or in sprawling, polluted cities. We live in an era where, as we have seen, pandemics can crop up out of nowhere and completely change life as we know it. Third spaces, especially third spaces which are free and accessible to all regardless of class or income, are shrinking and in many places have totally disappeared. This makes local green spaces and beauty spots even more vital lifelines. They are a much needed respite against stress, anxiety, and depression as well as providing a way to exercise and improve health completely free of charge.

9. This proposal is completely at odds with the soon to be celebrated Culture Dale programme, which heavily relies on themes of nature, environmental preservation, and protecting Calderdale's reputation for its picturesque surroundings. It seems illogical to hold events to clean up local brooks, immerse ourselves in nature, and celebrate Calderdale for a few weeks, while allowing projects which would poison the area for years to come. It would be like a slap in the face to all of the different community groups and individuals who have given their time and energy to craft this marvellous programme as well as the funders who are donating their grants to make it happen.

10. Finally, this idea has already been rejected, and for good reason. The fact that this business is now trying to underhandedly go ahead with it is extremely concerning and shows a complete lack of respect. The idea that our local council would allow this while continuing to collect money from the people it is supposed to serve as the cost of living spirals is even more disturbing and frustrating. I implore you to let no mean no - to avoid setting a precedent for uncaring businesses to do whatever they like at the cost of everyone else if only they are pushy and uncaring enough. You have the opportunity to send a clear message to those who live and work here that Calderdale Council DOES care, that it is worth its weight in gold, that Calderdale will take a stand and protect its most valuable asset - the environment itself. We can and should be proud of Calderdale and celebrate it with strong actions and policies just as much as events and art installations.

Due to the above concerns, I feel I have no choice but to speak up and raise my concerns and hope Calderdale Council

takes a stand for what is right.

Thank you for your time and consideration of these concerns.

Kind Regards

689 I am writing to object to the proposed incinerator on Sowerby Bridge.

There are so many children through housing, local nursery and schools that will be directly impacted.

This option should not even be considered at a time where are Supposed to be looking for ways to cut pollution, not increase it.

XXXXX

690 " object to the above proposal due to the site already having had a fire and the site being surrounded by woodland which could prove a deadly combination to wildlife and ancient trees at the very least.

Also, the site is in the bottom of a High sided Valley. The surrounding trees create a further barrier to the ease of free movement of wind so 'trapping' the smoke and smells. The site at Queensbury to which it has been compared has totally different topography and due to the height suffers more inclement weather including wind which allows for faster dispersal of smoke and smells.

Wrong place for such a site.

KInd regards

XXXXX

691 I very strongly object (once again) to the application by Calder Valley Skip Hire for an Incinerator at Belmont, Sowerby Bridge.

I have personal experience of this sit. I worked there between 1964 and 1967. At that time companies upstream were still allowed to disperse dyes into the water course. On many occasions throughout the year the odious smell this created were overwhelming, especially on still and or foggy days. This atmosphere sometimes lasted for days and was not pleasant at all. This same effect would inevitably occur with this Incinerator operational. The suggested chimney would not be anywhere near high enough to counteract this occurring.

I feel a diagram is not necessary for you to appreciate that the site IS IN A VALLEY and five days a week people young and old who live on the hillsides around here will be subjected to smelly harmful pollution.

I live on the Brockwell Estate above the site and likely to be greatly affected.

I would ask if you would want to live in that area? Do the Directors and families of CVSH live in the area?

Thank you for considering carefully what you decide going forward.

XXXXX

692

Dear Sirs,

I would like to object in the strongest possible terms to the above company's application for an environmental permit for operation of an incinerator in Sowerby Bridge ref S13/006 for the following reasons:

I am a frequent visitor to my partner's house and have experienced plumes of noxious emissions emanating from their Sowerby Bridge site, when there have been previous fires on this site. This also defines them as not a fit and proper company to operate an incinerator, and certainly not in the bottom of a valley where the emissions will not dissipate, and will add to the already elevated levels of pollution in the Ryeburn area.

Thank you in advance.

XXXXX

693

To whom it may concern,  
The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review. I do not understand why this application is allowed to be resubmitted.

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.  
Yours,  
XXXXX

694

Totally against  
A health hazard

Sent from my iPhone

695 I have lived in this beautiful valley for over 20 years and I strongly object to the proposed incinerator being built.

My concerns are:

1. The Wrong Location: the incinerator being located at the bottom of a valley. It is notable that under certain weather conditions unique to valleys toxic substances can be trapped by the phenomenon called temperature inversions.
2. Fears over risks to health of every living thing in the valley.

Incinerators presently contravene basic human rights as stated by the United Nations Commission on Human Rights, in particular the Right to Life under the European Human Rights Convention, but also the Stockholm Convention and the Environmental Protection Act of 1990. The foetus, infant and child are most at risk from incinerator emissions: their rights are therefore being ignored and violated.

Industrial emissions, stay fairly constant throughout the year, no matter what the season, on top of this cold temperatures and stagnant air have a way of creating a build-up of these substances near the ground, particularly during a weather phenomenon called temperature inversions.

Valleys also have unique weather because their sloping sides can trap hot air, causing the area to warm up considerably in the summer.

In other seasons or weather conditions, warm air sits near the ground and the air can rise easily and carry away pollutants. In a temperature inversion, cold air is trapped near the ground by a layer of warm air. The warm air acts like a lid, holding these substances down until they can grow to dangerous levels.

We have no control of these temperature inversions they are a natural occurrence, but we can control what we release into the air.

Many people would like to believe that waste disappears when it is burnt. In fact the burnt waste is transformed into ashes and gas. (A large incinerator for instance produces the equivalent of 300 wheelie bins of exhaust gases from its chimneys every second). As this happens, chemical reactions lead to the formation of hundreds of new compounds, some of which are extremely toxic. The number of substances released from a waste incinerator may run into thousands. So far, scientists have identified a few hundred substances as hazardous, just imagine this temperature inversion lid scenario happening in our beautiful valley with all that toxic waste spewing out of the chimney that is proposed in Sowerby Bridge.

In a House of Lords enquiry on 14th April 1999, Environment Minister Michael Meacher said, "Incinerator plants are the source of serious toxic pollutants: dioxins; furans; acid gases; particulates; heavy metals; and they all need to be treated very seriously. There must be absolute prioritisation given to human health requirements and protection of the environment. Some of the emissions are carcinogenic..."

#### Health Effects of Incinerators

Numerous studies confirm that a typical incinerator releases a cocktail of toxic chemicals, including dioxins, lead, cadmium, mercury and fine particles, into the atmosphere. However, there has been little follow up investigation into the effects of these poisons on people near incinerators. Greenpeace has compiled a comprehensive review of all the scientific studies carried out on people living near to or working in incinerators. The report Incineration and Human Health contains some worrying findings, for example:

- A study conducted on 70 municipal waste incinerators in the UK operating between 1974 and 1987, and 307 hospital waste incinerators from 1953 to 1980, identified a 2-fold increase in the cancer deaths in children living nearby. These results were consistent with a second study showing increased child cancers for hospital incinerators and large scale, high temperature combustion industries (study dates 1998 and 2000).
- In 1996, a study on residents living in an urban area near an incinerator in Italy found a 6.7-fold increase in deaths from lung cancer.
- A study in 1989 on people working at a Swedish incinerator between 1920 and 1985 found a 3.5-fold increase in deaths from lung cancer, and a 1.5-fold increase in deaths from cancer of the oesophagus. The same study also found an excess of ischemic heart disease, especially in workers with more than 40 years the list goes on...

- Buildings and Topography

Buildings can cause the plume to come to ground much closer to the source than otherwise expected, causing higher pollutant concentrations. Plumes can also impact on hillsides under certain weather conditions or become trapped in a basin or hollow.'

This statement holds special significance to members of the community. In addition to the incinerator being located at the bottom of a valley it is notable that under certain weather conditions emissions would potentially be trapped in the valley. We already have to put up with high traffic emissions especially when there are accidents on the motorway, traffic can back up through Ripponden and beyond.

My concern is with inversion of weather conditions we will see the residents of the Ryburn Valley experience increased concentrations of pollutants the knock on effect would mean more adults and children will be diagnosed with



lung diseases, cancers, and heart disease etc...

Conclusion.

Hopefully those making the decisions that will affect the thousands of people in the Ryburn valley and surrounding areas will have read all the officially proven and published studies, not just in the uk but around the world, and will refuse this submission.

Why?

Simply because they believe people's lives and health come first...

696 To whom it may concern, I am writing to express my strong objection to the Environmental Permit from Calder Valley Skip Hire to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

My concerns are with the serious environmental impact on local residents due to the harmful pollutants, increased traffic and flood risks causing damage to the water and ecosystems.

I was resident here when the site had a fire some years ago, which caused the smoke and emissions to hang in the valley for some time. Inside and outside of my house was affected by this, it was horrendous.

Any impact to the environment even minimal is still impact.

The risks from pollutants, emissions and flooding would also be very harmful to the wildlife and plants.

I have seen increased traffic and larger vehicles having to turn around off Rochdale Road in order to gain access to the site. There's already a strain on the small local roads, damage to walls and roads etc. Sowerby Bridge is already poor for air quality.

Calderdale Council states 'everyone different, everyone matters'. Please hear your residents when making your decision.

I request this application is refused.

XXXXX

I write on behalf of XXXXX Patient Participation Group to strongly object to the proposed operation of an incinerator in the Ryburn Valley. The reasons for our objection are as follows:

- The air quality in Sowerby Bridge (which is adjacent to the proposed incinerator) is already below the required air quality standards and the River Calder is one of the most polluted rivers in the country. Figures show that the health of local residents is poorer than the national average [in particular with respect to asthma, COPD, and cancer]. All of these are likely to get worse with the proposed operation of an incinerator situated in a deep-sided valley which is prone to flooding and feeds into the River Calder. Further there are several schools and nurseries in relatively close proximity to the site.
- In the valley, cloud inversion and variable wind patterns mean that clouds often remain trapped in the valley for many hours [as has been routinely observed by residents over many years, and particularly so in recent months]. This can only exacerbate any effects of the incinerator's operation and mean that potentially harmful particles and chemicals remain in the air for hours and increase the risks to the local-residents' already poor health and further potentially to harm many children in the area. If the modelling provided by the company suggests that no such climate effects are likely with the incinerator it can only suggest that their modelling relies upon faulty assumptions or they have not collected sufficient long-term data about weather patterns in the area [something which even the Met Office has said it cannot provide].
- Calderdale Skip Hire have a track record of complaints from local residents of noise, smell and environmental damage and their lorries have been witnessed by many residents [myself included] carrying loads through the town which are not properly covered resulting in particles, dust and other detritus issuing from them. Some years ago they had a fire at their site resulting in tons of refuse being burned. All this suggests a company which is not properly run and does not take its environmental or social responsibilities seriously. Further, I have been told by one of the councillors that neither Calderdale Council nor the Environment Agency have the resources [finance and staff] to monitor the operation of the site regularly. This means that granting them a licence to operate will give them a free hand to do as they like – and as stated above, given their track record, this seems a recipe for disaster.
- The proposed incinerator was rejected by a Government Planning Inspector. Calder Valley Skip Hire say that they did not challenge this decision because they thought another inspector might consider that Inspector Woolcock's decision had some merit. Instead, by this application, they are trying to get round the inspector's verdict rather than overturning it. They have provided no new data but have used some highly questionable modelling which presumably suggests that emissions from the incinerator will easily dissipate. This air dispersion modelling system [ADMS] uses a Gaussian dispersion model where dispersion under convection meteorological conditions uses a skewed Gaussian concentration distribution. The limitations of using Gaussian distribution models are well known by statisticians and idea that convection meteorological conditions can always be applied in this case flies in the face of years of observations by local people that clouds and smoke can remain in the valley for many hours at a time and, on occasion, for several days.

Thus, there is no reason to overturn, or rather by-pass, the inspector's verdict, and no grounds for granting the company an Environmental Permit.

For all the above reasons, XXXXX Patient Participation Group strongly object to the proposal to operate the incinerator.  
XXXXX

698 Dear Sir/Madam,

I vehemently object to the environmental permit application S13/006.

I have significant concerns with the impact of the incinerator on local air quality and the associated implications for human health.

Sowerby Bridge already suffers from poor air quality, with an AQMA declared within the town. The proposal will only exacerbate this situation and undermine efforts to improve air quality.

The location of the incinerator within the valley bottom and how the local topography and natural features (including woodland) will impact on dispersion is a major concern.

The supporting information submitted by the Applicant must be rigorously interrogated, particularly in light of the appeal for an environmental permit on this site that was dismissed last year.

Calderdale Council should be doing everything it possibly can to resist this application.

XXXXX

699

I live roughly XXXXX away from the site and my son also attends one of several local schools within the vicinity of the site. The addition of a flue to incinerate rubbish in a narrow funnel shaped valley will not allow the bellowing fumes and pollutants to disperse sufficiently and will mean a concentration of toxins and pollutants in the valley and could considerably effect my son's health along with the many other children from the area. I want my son to be able to grow up in safe and healthy environment and not to have his health put at risk. I want a clean environment, as per my right under the Clean Air Act.

I, also, understand the Council has over the years conducted a review of Norland Moor and wishes to protect the landscape. In addition local maps clearly show there is a nature reserve and recently built flood lagoon nearby which could be damaged and this will at sometime also impact on the local wildlife, moorland, vegetation, local farm Should the incinerator be successful, I am sure there would also be additional road traffic leading to further fuel emissions and traffic congestion in an already narrow valley. I am not aware of any planned road improvements and if so, are we to pay for them through taxation. Although the roads I could be improved or would like this to happen I do not want a highway to the incinerator for the benefit of CVSH.

I am sure there are plenty of more suitable sites, where the noise and dispersal of pollutants has less impact. I do not want our rural valley to become the dirty and unhealthy part of Calderdale where no one wants to live. I would like the valley to maintain its semi rural character, where inhabitants can enjoy the countryside. Plus the value of my property will be affected and there has been no adjustment in my valuable rating to reflect the deterioration in the local environment.

I would also point out after the site was first opened the noise level increased and in Summer there were some days when I could no longer sit out in my own garden to enjoy what used to be a nice peaceful valley. This situation changed back to some normality when the planning request was rejected. I am sure, if the site is allowed to expand and the hours are extended, the noise will increase yet again in volume and occur more often, including nights. This will impact on my families health and mental well being.

Finally given society is also being asked to think about and take part in reducing greenhouse gases and be more environmentally active, there is no need for another incinerator. The country already has enough capacity and increases in recycling and better use of the environment would mean the need for an incinerator is not required. Added to this, there is also legislation in Scotland and Wales which has halted the building of any more incinerators. So why should England or Yorkshire be treated any differently.

700

Hello

I am a resident of Calderdale and live in the Ryburn Valley.

I am registering my objection to the proposal to site a waste incinerator on Rochdale Road Sowerby Bridge.

My objection is based on the unsuitability of the site which had already been determined by the Government inspector:

“Unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”

Do we really want to allow the poisoning of the residents and wildlife within the Ryburn and Calder Valleys?

Also even if the waste gases were able to be dispersed from the waste site they would ultimately be landing elsewhere causing the same negative environmental impact.

A further objection would be around increased traffic congestion. Sowerby Bridge is a real bottleneck with standing traffic for large parts of the day causing pollution due to vehicle exhaust emissions. On the Rochdale Road above where Calder Valley Skip Hire is based there are regularly very large waste wagons parked up waiting to gain access to the site. This contributes to the traffic congestion on the A 58. The proposed incinerator is intended to operate 24 hours a day increasing traffic load on an already very congested highway.

Hopefully the strength of feeling against the incinerator from the residents of Calderdale will be taken into account by the decision makers within the LA. This development is not wanted and hopefully the correct decision will be made to reject the application once and for all.

In hope of a positive environmental outcome for the residents and wildlife of Calderdale.

XXXXX

701 Dear Calderdale MBC Environmental Health,

I am writing to express my objection to Calder Valley Skip Hire's application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

My primary objection is specifically a personal one.

- Our dwelling (XXXXX) is located at distance of approximately 500 meters from the proposed site (HX6 3LL), which is in a NE direction from our dwelling.
- The altitude of our dwelling is 173 meters above sea level. (Ref. google)
- The altitude of the proposed site (HX6 3LL) is 99 meters above sea level. (Ref.google)
- According to 3.6.23 of the application, the flue gases will be discharged via a 12 meter stack, (111 m above sea level) which is 62 meters below the altitude of our dwelling.
- Note However. A.37 under Figure 3.2 Complex Terrain Data used in Model in Appendix E 3. Response to Air Quality Consultants Review of Air Quality Assessment (March 2022) indicates that “the stack height would be approximately 96.4 m AOD (i.e., 12 m above ground level). This would make it 76.6 m below our dwelling.
- As I write to you today at 11:00 am on the first of April 2024, the met office web site (<https://www.metoffice.gov.uk/weather/forecast/gcw9s2zz1#?date=2024-04-01>) indicates that the current wind direction, at my location, is NE at 6 mph, gusting to 13 mph.
- If the facility was operating at this moment in time, we would be exposed fully to all the emission from the facility.

In addition to the above I also wish to object on the following grounds.

- The Government Planning Inspector John Woolcock refused the resubmitted application in July 2023 due to concerns about the discharge of waste gases and protecting human health and the environment.
- The original application says that, “CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time”, this has since been removed from the new application.
- The ‘health impact statement’ in the application states, that the release of pollutants, particularly dioxins ( carcinogens), will have a ‘minimal impact,’ therefore that indicates that it will have some impact
- The weather data used in the model is from Leeds Bradford Airport which is at an altitude of 208 meters, 24.8 kilometres North East of the proposed site and as such should be ignored.
- All elected representatives - councilors across parties and MPs - have opposed this application from the start.



XXXXX

702

Dear Sirs

I live XXXXX the incineration site and wish to register my objection to the application yet again.

My family had lived in this property for 36 years and never has the "atmosphere" noise, general vermin been worse than since CVSH set up business, they are supposed to keep to agreed operating hours - this doesn't happen.

I object on the grounds that the last appeal rejection should have been final, nothing has changed in the area to allow this stack to be operational

I would request a site visit as I believe the stack is already in place.

The gardens at times have had rats due to the piles of rubbish that build up on the site

We are unable to have windows open in summer when the wind blows a certain way due to the smell and build up of dust.

I object additionally on the following grounds

1. The Wrong Location: the incinerator being located at the bottom of a valley. It is notable that under certain weather conditions unique to valleys toxic substances can be trapped by the phenomenon called temperature inversions. Ask the local residents about dust, dying plants

2. Fears over risks to health of every living thing in the valley. Please see attached photo of a mature deer that regularly visits my garden, of pheasants that visit the garden and deer often forage on the garage site above Incinerators presently contravene basic human rights as stated by the United Nations Commission on Human Rights, in particular the Right to Life under the European Human Rights Convention, but also the Stockholm Convention and the Environmental Protection Act of 1990. The foetus, infant and child are most at risk from incinerator emissions: their rights are therefore being ignored and violated.

Industrial emissions, stay fairly constant throughout the year, no matter what the season, on top of this cold temperatures and stagnant air have a way of creating a build-up of these substances near the ground, particularly during a weather phenomenon called temperature inversions. (this can be evidenced by the area always being a couple of degrees colder in winter compared to pye nest/ king cross)

Valleys also have unique weather because their sloping sides can trap hot air, causing the area to warm up considerably in the summer.

In other seasons or weather conditions, warm air sits near the ground and the air can rise easily and carry away pollutants. In a temperature inversion, cold air is trapped near the ground by a layer of warm air. The warm air acts like a lid, holding these substances down until they can grow to dangerous levels.

We have no control of these temperature inversions they are a natural occurrence, but we can control what we release into the air.

Many people would like to believe that waste disappears when it is burnt. In fact the burnt waste is transformed into ashes and gas. (A large incinerator for instance produces the equivalent of 300 wheelie bins of exhaust gases from its chimneys every second). As this happens, chemical reactions lead to the formation of hundreds of new compounds, some of which are extremely toxic. The number of substances released from a waste incinerator may run into thousands. So far, scientists have identified a few hundred substances as hazardous, just imagine the lid scenario happening in our beautiful Ryburn valley with all that toxic waste spewing out of the chimney that is proposed in Sowerby Bridge.

In a House of Lords enquiry on 14th April 1999, Environment Minister Michael Meacher said, "Incinerator plants are the source of serious toxic pollutants: dioxins; furans; acid gases; particulates; heavy metals; and they all need to be treated very seriously. There must be absolute prioritisation given to human health requirements and protection of the environment. Some of the emissions are carcinogenic...

#### Health Effects of Incinerators

Numerous studies confirm that a typical incinerator releases a cocktail of toxic chemicals, including dioxins, lead, cadmium, mercury and fine particles, into the atmosphere. However, there has been little follow up investigation into the effects of these poisons on people near incinerators. Greenpeace has compiled a comprehensive review of all the scientific studies carried out on people living near to or working in incinerators. The report Incineration and Human Health contains some worrying findings, for example:

\* A study conducted on 70 municipal waste incinerators in the UK operating between 1974 and 1987, and 307 hospital waste incinerators from 1953 to 1980, identified a 2-fold increase in the cancer deaths in children living nearby. These

results were consistent with a second study showing increased child cancers for hospital incinerators and large scale, high temperature combustion industries (study dates 1998 and 2000). ♦

\* In 1996, a study on residents living in an urban area near an incinerator in Italy found a 6.7-fold increase in deaths from lung cancer. ♦

\* A study in 1989 on people working at a Swedish incinerator between 1920 and 1985 found a 3.5-fold increase in deaths from lung cancer, and a 1.5-fold increase in deaths from cancer of the oesophagus. The same study also found an excess of ischemic heart disease, especially in workers with more than 40 years the list goes on... ♦

\* Buildings and Topography

Buildings can cause the plume to come to ground much closer to the source than otherwise expected, causing higher pollutant concentrations. Plumes can also impact on hillsides under certain weather conditions or become trapped in a basin or hollow.‘

This statement holds special significance to members of the community. In addition to the incinerator being located in the bottom of a valley it is notable that under certain weather conditions all emissions would potentially be trapped in the valley.

We already have to put up with high traffic emissions, when there are accidents on the motorway, traffic can back up through Ripponden and beyond. My concerned is with the inversion of weather conditions seen in valleys and incinerator added to the high volume of traffic, could see the residents of the Ryburn Valley experience increased concentrations of toxic pollutants, the knock on effect would mean more adults and children will be diagnosed with lung diseases, cancers, and heart disease to name a few.

Conclusion.

How can a previously rejected on appeal application be reconsidered.

Hopefully those people who will be making decisions that will affect everyone in the Ryburn valley and surrounding areas will have read all the proven and published official studies, not just in the uk but around the world and they will refuse planning permission.

Why?

Simply because they believe people's lives and health come first...

Yours sincerely

XXXXX

703

Dear Sirs,

On behalf of XXXXX, I wish to object to the application by Calder Valley Skip Hire for an environmental permit to operate an incinerator in Sowerby Bridge.

The XXXXX is based in XXXXX in Sowerby Bridge and XXXXX members paddle a stretch of water at the confluence of the Calder and Ryburn rivers most days of the week, all year round. We are concerned about how the incinerator emissions might affect air quality in the valley bottom and hence the health of those members, including children and the elderly, who use the river regularly.

Given that air in the Calder Valley generally flows from west to east, it is likely that when cloud and mist lingers on the river, as it frequently does, emissions will flow down river and into the path of our members. We seek reassurance that our members will not be subject to new pollutants as a result of the proposed incinerator operation but we understand that the impact of the emissions cloud has not been effectively modelled or analysed to date.

In light of this failure, we wish to object to the grant of an Environmental Permit to the applicants due to uncertainty about how the health of our members might be affected.

Yours faithfully,

XXXXX

704

XXXXX (above the proposed Incinerator)

I very strongly object to the introduction of an Incinerator in Sowerby Bridge.

How can the refusal of the permit to build the Incinerator in Sowerby Bridge by the Government Planning Inspector be overruled by a small Group of Council Officers, even after ALL local Councillors of ALL political parties and two local MPs have opposed this application from the beginning.

The steep sides of the Ryburn Valley would very quickly be filled with obnoxious fumes and fall out debris from an Incinerator plant of this size.

There is an Incinerator in Ardley, Near Bicester that is not in a valley and we regularly pass and the ensuing odour travels for miles.

Can this idea really be an indication of how little the Council considers the welfare of the local population?

Please consider very carefully.  
XXXXX

705    Hi

I'm emailing my objections to the proposed incinerator in Sowerby bridge. I do not want this to go ahead.

Thanks  
XXXXX

706 Sir/Madam,

This email is to voice my very strong objection to a new application for an environmental permit by Calder Valley Skip Hire to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

A previous application was refused at appeal, on the 5th July 2023, by Government Planning Inspector, John Woolcock. There is no rationale for now ignoring that refusal. Calder Valley Skip Hire cannot simply keep applying until they get their way. Their profit cannot be valued over the health of local residents.

The negative health implications of the potential incinerator, placed at the bottom of a valley, are obvious and cannot be overstated. As a businessman proud to work in Sowerby Bridge for international clients, I would be aghast to have any of them visit only to be exposed to even further pollution than the existing pollution from the considerable traffic that passes through.

The incinerator application was refused only eight months ago in July 2023; nothing has changed, there is no reason for it to be allowed this time either.

Sincerely,

-XXXXX



707 To whom it may concern

I am writing to object to the latest application for CVSH to build an incinerator in the valley - the very reasons it was turned down before are still very valid, nothings changed, we still live in a valley!

CVSH have recently had a hydraulic fail on my road and allowed the fluid to run in the the drains before making half an effort to cover it with sand and then leaving that, taking a phone call and 2 emails to get them back to clear it up- this is just one example of them not caring for the local area and environment.

I strongly object to them being allowed to overturn a several times rejected plan based on all previous evidence of why it should not be allowed - health environment, wildlife to name but a few.

I would be very disappointed if Calderdale Council allowed this to go ahead.

Regards

XXXXX

Mum of 3 children who don't deserve their health to be put at risk by this

The SWIP at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge was refused the environmental permit by government planning inspector John Woolcock on the 5th July 2023. CVSH did not exercise their option for judicial review at the time, effectively closing the matter of the environmental permit. This new application has circumvented the due course as it is a rehashed version of the previous one which was rejected by a final decision by the government planning inspectorate. This is an improper attempt to avoid the correct scrutiny on the matter by pushing it to a lower office to make a decision. It is incompetent of Calderdale Council to proceed with this application based on the most thorough legal assessment already ruled upon by inspector John Woolcock.

Notwithstanding my main point, decisions on this specific incinerator should not sit with the council as the plant is above the processing thresholds (CVSH submission states 4.75 tonnes per hour for 8 hours per day) which would mean it should be considered by the Environmental Agency. Furthermore, the application is littered with errors, inconsistencies and poor scientific rationale. The plant is in a high flood risk area, at a valley bottom with a small stack and using wind modeling data with entirely different topography and air movement. All these reasons were why inspector John Woolcock made his final decision in that he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment".

It is clear that Calderdale council is not currently able to competently assess such applications and sufficiently critique the "new" data CVSH has presented. If the council is not willing to acknowledge the previous (and exceptionally recent) assessment of the application, they should either refer it to the Environment Agency and/or delay the decision to which point independent modeling and evidence gathering can be undertaken. The timing on this should consider the political landscape and should inevitably be after the upcoming general election. CVSH Ltd. approach and timing is improper and does not follow due course of English law and could be perceived to be an attempt to ambush and bully the Council into not following its own legal obligations/due process.

Undoubtedly this objection will be one of many received. This should help the Council understand the overwhelming public objection, not only to the incinerator but also the lack of process followed by CVSH in their attempted push through an environmental permit.

Please carefully consider these points before making judgement on this serious matter for Calderdale and the residents of Sowerby Bridge.

Sincerely  
XXXXX  
Resident of XXXXX

709 To whom it may concern,

I am writing to vehemently oppose the environmental permit application (S13/006) submitted by Calder Valley Skip Hire (CVSH) for the proposed waste incinerator on Rochdale Road in Sowerby Bridge. This issue strikes a deep chord with me, not only as a resident directly affected by this development but also as a parent of an XXXXX -year-old child and the caretaker of a small holding where I raise pygmy goats and sheep. The potential health and environmental ramifications of such a facility only XXXXX miles away (and directly underneath my residence) are deeply troubling, and I urge the council to consider the gravity of this matter.

The proposed site's unsuitability for such a project is glaringly evident. Nestled in a deep-sided, tree-lined residential valley already burdened by high pollution levels, the addition of a waste incinerator would compound existing environmental concerns and pose significant health risks to our community. The adverse effects of air pollution on respiratory health, particularly among children and vulnerable populations, cannot be overstated. Furthermore, the proximity of the incinerator to my small holding raises alarming concerns about the well-being of my livestock, who would be exposed to potentially harmful emissions.

Moreover, the site's susceptibility to flooding adds another layer of complexity and risk to this proposal. Given the increasing frequency and intensity of extreme weather events in recent years, the potential for hazardous pollutants to be released into the environment during flooding incidents is a cause for serious concern. It is imperative that the council thoroughly assesses the potential impact of such events on the safety and stability of the proposed incinerator.

Additionally, the lack of comprehensive and site-specific modelling to predict the dispersion of emissions is deeply troubling. In a valley characterized by complex wind patterns and temperature inversions, accurate modelling is essential to fully understand the potential impact of the incinerator on air quality and human health. The council must insist on robust modelling that takes into account the unique geographic and atmospheric conditions of the site before making any decisions regarding this application.

Furthermore, there are legitimate doubts regarding the competence of CVSH to safely and responsibly operate a waste incinerator. Past attempts by the company to secure approval for similar projects have been met with opposition and skepticism, culminating in the recent dismissal of their appeal by planning inspector John Woolcock. The concerns raised by Mr. Woolcock regarding the potential adverse effects on human health cannot be ignored, and the council must exercise caution in considering any further applications from CVSH.

In conclusion, I implore the council to prioritise the health and well-being of our community over corporate interests. Approving this environmental permit would not only endanger the lives and livelihoods of residents and their animals but also set a dangerous precedent for future development in our area. I urge you to reject the permit application submitted by Calder Valley Skip Hire and instead focus on sustainable and responsible solutions to our waste management needs.

Thank you for considering my objections and for your commitment to safeguarding the interests of our community.

Sincerely,

XXXXX

710 To whom it may concern,

I am writing to state my objection against the application for environmental permit for Schedule 13 small waste incineration plant. Ref: S13/006

I object to this plan as it will be catastrophic for the residents and environment of the Calder Valley. We are at a turning point in history where it is our duty and responsibility to mitigate the effects of Climate Change for the benefit of our planet and our future generations, and this incineration plant will be a dangerous step in the wrong direction.

Kind regards,

XXXXX

711 Calder Valley Skip Hire SWIP application objection.

Ref S13/006

Issues of concern

1. Unknown impact on human health- harmful emissions.

The modelling of air pollution does not satisfactorily represent the conditions in the valley even with rough surface calculations. The stack height is low, the point of emissions is near level with the houses on Rochdale Road and the mixing of air/ dilution of pollution at the point of emission is unknown. There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on 1 particular model which does not allow for the topography, the woodland, the inversions in this valley.

Each report for air quality, uses terms like: estimates, projected, calculated based on a model of air distribution at Leeds Airport. Some parameters have been set with the agreement of CVSH which is completely inappropriate. The Valley suffers from inversions which will keep the pollution in the air that we breathe at low levels. The stack height should be much, much higher in this location but this is not even a consideration. Is it really acceptable to allow a risk to human health! Levels of dioxins and furans are predicted to be higher in the area and yet these are only estimates. On this above basis ALONE the permit should be refused. The flue is not high enough to achieve dilution - the risk to human health has not adequately been determined and the effect on human health will be SIGNIFICANT.

2. Air Quality

The addition of this significant amount of emissions to the atmosphere will impact on air quality within the boundary. The data provided by the applicant shows much higher pollution levels at Spring Hill Mills area, this is due to prevailing wind conditions. Pollutants when they are able to disperse in the winter months will likely blow into the AQMA having a seriously detrimental impact on air quality within the AQMA and surrounding areas.

The original submission suggested that there will not be an increase in waste transfer in and out of the site. This is incredulous. A business will operate to achieve maximum profits. It is profitable now bringing in waste sorting and moving waste to landfill. The operation will continue and the site will take in more waste to burn- numbers of vehicles to the site will likely double if not triple at a guess. The effect on AQMA will be SIGNIFICANT.

3. Noise

The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door will be open for much of the time, severely impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that during the day but ESPECIALLY at night.

#### 4 Flora and fauna

Much has been made of the trees which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact on hot gases on these trees? How will these harmful chemicals affect the local ecology? Deer are well known to roam the woods, badgers, cuckoos, bats. The woods all along the valley are alive with a wealth of birds and animals, how is nature to be protected? The flue is definitely not high enough to allow gases to escape and the environment will be HARMED. How can these be even a consideration. How is it that the suggestion of congestion charges to be introduced to protect the health of people, the environment - yet this is allowed to be a consideration?

#### 5. Enforcement

CMBC has insufficient resources to ensure adequate enforcement, a severe lack of specialists to deal with such a site, and there is also an apathy towards enforcement. The Authority has been THREATENED with litigation by CVSH, so how can they then take enforcement action against them now?

#### 6. Probable amendment to hours of operation

As mentioned above, the company will want to make profit, it is likely( let's be honest - more than likely) that they will want to extend operating hours which will further impact on the matters raised above.

#### REFUSAL ON THE GROUNDS:

Inadequate dispersal and dilution of chemicals which ARE HARMFUL TO HUMAN HEALTH.

- The stack height is inadequate!
- Dilution is NEGATIVELY affected by the location of the plant, in the bottom of the valley.
- Dispersal is NEGATIVELY affected by the location of the emission point of the flue.



- Dispersal is NEGATIVELY affected by the trees.
- Dispersal is NEGATIVELY affected by inversions.
- INSUFFICIENT EVIDENCE has been provided to prove that the incinerator will not be HARMFUL TO HUMAN HEALTH or the ecology.

The permit should be REFUSED.

The Council are employed by the people and act on behalf of the people. They are not there to accept bribes and deals made by companies and put the peoples' lives and health at risk for profits! Questions will be raised. Explanations will be chased and no longer will bad decisions be accepted.

XXXXX - very concerned parent!

712 NO

Resubmission of an application dates 5th August 2020 which was refused at appeal on 5th July 2023. Why is this even being reconsidered? Has the evidence that led John Woolcock to refuse the application changed?

The Government inspector said that given the height and proximity of the smoke stack to trees and woodland he was: 'unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment'

The Met Office commenting on the application said:

'this is the kind of application we could not support as we could not meaningfully assess conditions within that narrow deep valley which would be prone to inversion/cold air pooling'

There are 9 schools within 1 mile of the site, 18 schools within 2 miles in a valley that already suffers from high pollution due to heavy traffic. Sowerby Bridge is in an air quality management area - why risk the health of our children by potentially increasing pollution with dioxins?

Who will benefit from the incinerator? Calder Valley Skip Hire will be the only beneficiaries - why boost the interests of a private business for the sake of the health of local residents?

Unless there is irrefutable evidence that the incinerator will improve living conditions and health of residents, this application should be refused.

I object to the application for an environmental permit to operate a waste incinerator by Calder Valley Skip Hire.

XXXXX

713

Dear Calderdale Metropolitan Borough Council,

I am writing to express my deep concern and opposition to the proposed granting of an environmental permit to Calder Valley Skip Hire Ltd for the operation of a small waste incineration plant (SWIP) at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.

Firstly, and most importantly. This matter has already been decided by HM government inspector John Woolcock who dismissed the appeal of the previous application. Mr Woolcock concluded he couldn't find that granting an environmental permit wouldnt have an adverse impact on human health.

'Taking all the above into account, I consider that the appeal should be dismissed because I am not satisfied on the evidence adduced that the proposal complies with IED Article 46 1., which requires that waste gases from waste incineration plants and waste co-incineration plants shall be discharged in a controlled way by means of a stack the height of which is calculated in such a way as to safeguard human health and the environment. Furthermore, I am unable to find that the necessary measures have been taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.'

For an application to be submitted again as a new application it must show that there are material differences and that the points raised in the previous decision have been addressed - this is not the case , there are no material changes to the new application in reference to the findings against the incinerator. The stack height, the topography of the valley and the location of the stack in trees, plus the unknown quantity of this dispersion of the emissions has not been addressed materially. Rather the applicants have relied heavily on the ADMS computer model to predict the flow and dispersal of waste gases from the proposed incinerator. However, it has come to light that the data used in this model is not representative of the local conditions at the proposed site. Instead, the data has been sourced from Leeds Bradford Airport, which is situated in a vastly different topographical and meteorological context. A wide open airport which bears no resemblance at all to a very steep sided wooded valley. Although there has been a ceramic filter added to the proposed stack, this will only filter particulates and not gases.

As mentioned, the proposed incinerator site is located at the bottom of a steep-sided valley, surrounded by dense woodland. This unique topography creates a microclimate that is distinct from the open, flat terrain of an airport. The complex interactions between the valley walls, trees, and local wind patterns would significantly influence the dispersal of pollutants from the incinerator stack. The ADMS model, based on data from a completely unrepresentative location, fails to accurately capture these site-specific factors and therefore produces invalid and unreliable predictions of the incinerator's environmental impact. There is a question as to why the local weather monitoring site in Sowerby bridge wasn't used for this modelling - could it be that the data would not show the right result for the applicant?

It must be the case in this instance the only reasonable approach for the applicant to take in order to materially address

these unknowns is to submit a new planning application for a significantly different solution which takes into account the topography of the land, which would of course be a much higher stack - which considering the Valley and the local known micro climate - smoke and mist regularly lying at the bottom of the steep sided valley and temperature inversions, which stop waste gases dispersing again suggests the location for any incinerator should not be agreed in Sowerby bridge.

It is crucial that any decision on the environmental permit be based on robust, site-specific data and modelling that takes into account the unique characteristics of the local environment. The use of this data from Leeds Bradford Airport surely means that the applicants modelling results are misleading and cant be used to support the reasons which the original application was turned down - regarding the safety and acceptability of the incinerator's emissions.

In addition there also appears to be a lack of due Process in Council's Decision-Making. I am deeply troubled by the council's refusal to hold a vote on this critical matter. The decision to grant or refuse an environmental permit for a controversial incinerator project is a significant one that requires careful deliberation, transparency, and accountability. By failing to hold a vote, the council is denying elected representatives the opportunity to formally express the views and concerns of their constituents. This lack of democratic process raises serious questions about the fairness and integrity of the decision-making process.

The council has a duty to ensure that all relevant information is thoroughly scrutinised, and that the voices of the community are heard and given due consideration. The absence of a formal vote suggests a lack of willingness to engage in open debate and casts doubt on the council's commitment to making an informed and impartial decision that serves the best interests of the local population. In addition there is a suggestion of ' intimidation of council members at the recent public hearing. According to several council members who were present, they have received legal threats from the applicants - suggesting that if the decision they reached was against the applicant they would be legally pursued for damages. This is clear grounds for appeal. And a matter of extreme concern - is this a democratic process? This in itself are reasonable grounds to appeal any decision made by the council officers in this case.

The council also has an obligation to explore and prioritise alternative waste management solutions that are sustainable, environmentally friendly, and pose minimal risk to public health. Incineration is known to emit harmful pollutants, including dioxins, furans, and heavy metals, which can have severe and long-lasting impacts on air quality, human health, and the natural environment. The council must give serious consideration to cleaner alternatives such as enhanced recycling, composting, and waste reduction initiatives before resorting to Incineration. I personally have severe Asthma and am so concerned about the impact on my health, I will have to move my family ( I am very active in the local community) and my local business elsewhere.

There are also a number of schools near the incinerator, a large high school, Ryburn with more than 1,000 students almost directly above the site as well as junior schools, nursery etc. It's known that children are much more affected by

pollution than adults, it's inconceivable that an incinerator would be located in such a populated valley with clear questions around the environmental impact - and the fact that the most senior planning officer in the land has followed due process and found against granting a licence. - It seems to be a risk to the council to go against this decision - and one which will clearly leave the council and the process open once again to legal challenge and judicial review.

The potential health risks associated with the incinerator are of utmost concern, particularly given the proximity of the site to residential areas and schools. The council has a duty of care to protect the well-being of its residents and must apply the precautionary principle when assessing the potential impacts of the incinerator on public health. The absence of a comprehensive health impact assessment that takes into account the specific vulnerabilities of the local population is a glaring omission in the decision-making process.

One further point is that the original application says that CMBC may request copies of the site diary and site inspection records at any time - which has now been removed - this calls into question the intention of the applicant to run the site as specified - and in fact other planning conditions placed on the applicant about the site - namely the wall to the river have not been met, this suggests a disregard to follow directions from the council by the applicant.

In conclusion, I urge the council to reject the environmental permit application for the proposed incinerator. The reliance on inadequate and inappropriate modelling data, which does not materially address the reason which caused John Woolcock the most senior planner who's decision can only be turned down by judicial review. The lack of due process in the council's decision-making, and the failure to prioritise alternative waste management solutions and public health concerns which have not been materially addressed and where the precautionary principles must be applied to if there is any doubt at all.

The council must fulfil its responsibilities to the community by ensuring that any decision on the incinerator is based on sound scientific evidence, meaningful public consultation, and a commitment to protecting the environment and the health of its residents. When the decision is made in the case, when considering human health, the precautionary principle must always be applied to any decision making.

There are so many grounds for this application being turned down, it's difficult to understand why it was accepted in the first place. I trust the council will take my concerns into account as part of the decision and make a decision that prioritises the long-term well-being of Calderdale's environment and people, as well as protecting the public purse against any further extrapolation of this process, and turning the application down. Any vote in favour will leave the council open to legal challenge again, on the grounds stated within this letter - due process in the decision making, a frustration of the community rights to be represented by voted for councillors and no material grounds to find against a previous decision made by John Woolcock.

Sincerely,  
XXXXX

714 Schedule 13 small waste incineration plant. Ref: S13/006

I strongly object to the proposed incinerator being built.

My concerns are:

1. The Wrong Location: the incinerator being located at the bottom of a valley. It is notable that under certain weather conditions unique to valleys toxic substances can be trapped by the phenomenon called temperature inversions.

2. Fears over risks to health of every living thing in the valley.

Incinerators presently contravene basic human rights as stated by the United Nations Commission on Human Rights, in particular the Right to Life under the European Human Rights Convention, but also the Stockholm Convention and the Environmental Protection Act of 1990. The foetus, infant and child are most at risk from incinerator emissions: their rights are therefore being ignored and violated.

Industrial emissions, stay fairly constant throughout the year, no matter what the season, on top of this cold temperatures and stagnant air have a way of creating a build-up of these substances near the ground, particularly during a weather phenomenon called temperature inversions.

Valleys also have unique weather because their sloping sides can trap hot air, causing the area to warm up considerably in the summer.

In other seasons or weather conditions, warm air sits near the ground and the air can rise easily and carry away pollutants. In a temperature inversion, cold air is trapped near the ground by a layer of warm air. The warm air acts like a lid, holding these substances down until they can grow to dangerous levels.

We have no control of these temperature inversions they are a natural occurrence, but we can control what we release into the air.

Many people would like to believe that waste disappears when it is burnt. In fact the burnt waste is transformed into ashes and gas. (A large incinerator for instance produces the equivalent of 300 wheelie bins of exhaust gases from its chimneys every second). As this happens, chemical reactions lead to the formation of hundreds of new compounds,

some of which are extremely toxic. The number of substances released from a waste incinerator may run into thousands. So far, scientists have identified a few hundred substances as hazardous, just imagine the lid scenario happening in our beautiful Ryburn valley with all that toxic waste spewing out of the chimney that is proposed in Sowerby Bridge.

In a House of Lords enquiry on 14th April 1999, Environment Minister Michael Meacher said, "Incinerator plants are the source of serious toxic pollutants: dioxins; furans; acid gases; particulates; heavy metals; and they all need to be treated very seriously. There must be absolute prioritisation given to human health requirements and protection of the environment. Some of the emissions are carcinogenic...

#### Health Effects of Incinerators

Numerous studies confirm that a typical incinerator releases a cocktail of toxic chemicals, including dioxins, lead, cadmium, mercury and fine particles, into the atmosphere. However, there has been little follow up investigation into the effects of these poisons on people near incinerators. Greenpeace has compiled a comprehensive review of all the scientific studies carried out on people living near to or working in incinerators. The report Incineration and Human Health contains some worrying findings, for example:

- \* A study conducted on 70 municipal waste incinerators in the UK operating between 1974 and 1987, and 307 hospital waste incinerators from 1953 to 1980, identified a 2-fold increase in the cancer deaths in children living nearby. These results were consistent with a second study showing increased child cancers for hospital incinerators and large scale, high temperature combustion industries (study dates 1998 and 2000).

- \* In 1996, a study on residents living in an urban area near an incinerator in Italy found a 6.7-fold increase in deaths from lung cancer.

- \* A study in 1989 on people working at a Swedish incinerator between 1920 and 1985 found a 3.5-fold increase in deaths from lung cancer, and a 1.5-fold increase in deaths from cancer of the oesophagus. The same study also found an excess of ischemic heart disease, especially in workers with more than 40 years the list goes on...

#### \* Buildings and Topography

Buildings can cause the plume to come to ground much closer to the source than otherwise expected, causing higher pollutant concentrations. Plumes can also impact on hillsides under certain weather conditions or become trapped in a basin or hollow.'

This statement holds special significance to members of the community. In addition to the incinerator being located in the bottom of a valley it is notable that under certain weather conditions all emissions would potentially be trapped in the

valley.

Regards, XXXXX



715 Dear Calderdale Council,

I hope this email finds you well. I am writing to express my deep concerns regarding the proposed installation of an incinerator in our small town. After learning about this project, I feel compelled to voice my opposition due to several reasons that I believe warrant reconsideration.

First and foremost, the environmental impact of such an installation cannot be overstated. Incinerators emit various pollutants into the air, including harmful particulate matter and toxic gases, which can have detrimental effects on both human health and the surrounding ecosystem. Given the compact nature of our town, the potential health risks posed by these emissions are particularly alarming.

Furthermore, the presence of an incinerator could negatively impact property values in the area. Many residents, myself included, have invested significantly in our homes and properties, and the prospect of decreased property values as a result of the incinerator's presence is deeply concerning.

Additionally, there are alternative waste management solutions available that are both environmentally sustainable and economically viable. Investing in recycling programs, composting facilities, and other green initiatives would not only mitigate the environmental impact of waste disposal but also contribute to the long-term well-being of our community.

I urge you to reconsider the decision to proceed with the installation of the incinerator and instead explore alternative waste management solutions that prioritize the health and prosperity of our town and its residents. I am more than willing to participate in further discussions or provide additional information on this matter.

Thank you for considering my concerns. I look forward to hearing from you soon.

Sincerely,  
XXXXX

716 I object to this application especially as previous work showed it would have an adverse effect on human health.

Please do not grant this to go ahead

Thank you

XXXXX

717 Hi whoever need to read this,  
I hope you're doing well. My name is XXXXX, and I'm writing to you because I'm really worried about something happening in Norland. I heard that there's a plan to build an incinerator nearby, and I think it's a terrible idea.

I'm only XXXXX years old, but I've learned in school about how harmful incinerators can be to the environment and our health. They release dangerous chemicals into the air, like carbon monoxide and mercury, which can make people sick. Plus, they contribute to air pollution and climate change, and that's something we definitely don't need more of.

I love playing outside with my friends and breathing in fresh air. But if the incinerator gets built, I'm afraid it will make the air dirty and unsafe for all of us. I don't want to have to worry about getting sick from breathing in pollution every time I go outside.

I know adults are in charge of making these decisions, but I hope you'll listen to us kids too. We care about our planet and our future just as much as you do. Please, do everything you can to stop the incinerator permit from being approved.

Thank you for listening.

Sincerely,

XXXXX

718 Good afternoon,

I am writing to voice my objection to the planned incinerator at calder valley skip hire. I strongly believe it will have a very negative impact on the area and goes against what the community is trying to do in improving the area. I urge you to consider the impact and not approve this application.

Thank you,  
XXXXX

719 Dear Calderdale,

I am writing to object to the proposed use of the incinerator at Sowerby Bridge. The previous Government Planning Inspector refused the application due to concerns about the discharge of waste gases and their risks to the health of local people and the environment. There are 9 schools within 1 mile and 18 schools within 2 miles of the chimney, and the proposal does not adequately address the health risks associated with the emissions, particularly for infants and children. The proposal relies on inadequate dispersion modeling, and the site has a history of fires and flood risk. The application incorrectly lists the site as not being at risk of flooding. I urge you to refuse this application due to the unacceptable risks to our air quality and health.

XXXXX

720

Good Afternoon

I am writing today to make a formal objection to the proposed incinerator by Calder Valley Skip Hire. It has come to my attention that the aforementioned business is looking to gain permission to build a large industrial incinerator on its property in Sowerby Bridge and I as a resident of the area whole heartily object to this terrible idea.

The negative effects on the local wildlife and residence will be incalculable if this incinerator is allowed to be built. Many residents feel as though this venture will damage the area, air quality and local ecosystem.

The incinerator is proposed to be built in one of the lowest topographical areas of the valley Catchment. The likely effect of rising emissions and pollution will be negative. Reducing in lower air quality, risk to human health and also having g adverse effects on local protected wildlife.

A 24 hour plant will likely 0have a negative effect on nocturnal nesting species such as bats.

Also I would like to note that along the property boundary at the River side there is a substantial amount of Japanes Knotweed. This species is a UK secedule 9 species, this species cannot be allowed to spread by law. The fact that the stand is so mature, that the river bank is a perfect vector for spreading this invasive species and that Calder Valley Skip Hire has done nothing to manage this devastating invasive species suggest to me that the company cares little for the environmental impacts its work has on the area and gives be no confidence that the will seek to protect.out valuable and vulnerable ecosystem.

Please stop this application and please do not allow this destructive infrastructure to be built.

Kind Regards

XXXXX

721

To whom it may concern,

As a resident of Sowerby Bridge I object to plans for the proposed incinerator. We deserve the most basic right to breathe clean air. Sowerby Bridge has already been found to have poor air quality and an incinerator will only add to an ever increasing crisis of pollution within our town.

The added fact that another application is going ahead despite being refused on appeal on the 5th July 2023, and that our elected representatives are refusing to vote on the matter, is absolutely appalling. Add to this the close proximity of several day nurseries and schools to the site, this proposal cannot be allowed to go ahead.

Yours sincerely,

XXXXX

722

Good Afternoon

Please accept this email as an objection to the incinerator on rochdale Road, Sowerby Bridge.

This is in the bottom of the valley, at the side of a wooded area that has ample wild life.

I believe that the fumes from the incinerator will linger in the bottom of the valley as the smoke did a few years back, when it caught fire.

The area is a very populated, with ample schools close by.

Kind Regards

XXXXX

723

Dear Sir/ Madam

I am writing to express opposition to the proposed granting of an environmental permit to Calder Valley Skip Hire Ltd for the operation of a small waste incineration plant at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.

As a mum of 3 small children, I am dismayed that this application has yet again been submitted. As this was already turned down by the senior planning officer of HM government - the next stage for the applicant should have been a judicial review, and yet, they have said they are not using this result as they feel they will be turned down again - this suggests they have no confidence in their own application when it comes to any additional review by another senior government planner. They decide instead to follow what they consider to be a less robust route. Which is to apply again. In order for this to be legal there must be a material difference to the application - the only thing considered material is the new weather modelling - however this is flawed as it's using a weather station in Leeds Bradford airport. There is a local weather monitoring station on the Sowerby bridge - why haven't they used this? Is it because it shows that their submission would likely cause damage to human health as found by John Woolcock in the previous appeal? This data cannot replicate the local topography - a steep sided valley with trees and a low stack. - therefore this cannot be considered as material. And subsequently the application must again be declined on the previous grounds stated by John Woolcock.

It's the council's responsibility to apply precautionary principles to any decision regarding public health. As there's no material change it must be found that John Woolcock's considered and expert (surely the most expert) decision must be taken into consideration.

In fact, It seems that as there is no material change to the application made - it shouldn't have been allowed by the council in the first instance.

In addition - the elected councillors are not voting in this case as they maintain they have been intimidated / threatened by the applicant, with legal action if they find against him. - this is not fair to people of Sowerby bridge who aren't being given their due processes and full consideration by the people who represent them. This is a clear cause for appeal should the decision be found in the applicant's favour.

Finally, as a mum of 3 whose schools are in the location - i don't believe there's the mitigation to show there won't be any impact to children's health. Who are impacted more by environmental toxins than adults. Given more or less the same application has already been through a very lengthy process and reviewed by the most senior planner in this process who's turned it down, it would have to be a materially different application in order to show how this was not the case - i trust the council will be taking this into account as part of the decision making process.

724

Dear Calderdale,

In July 2023, the Government Planning Inspector rejected the initial application due to apprehensions about the hazardous consequences of waste gases on the health of nearby residents and the environment.

\* The proposed incinerator has faced opposition from all elected representatives and MPs, emphasising the community's commitment to preserving clean air.

\* The proximity of the chimney to schools (within 1 mile and 2 miles) poses a substantial risk to the health of children and adolescents.

\* The specific layout of the Ryburn valley and wind patterns will result in polluting gases being directed towards the local population. This concern is heightened by the high rate of respiratory tract infections in infants under one year in 2016 and asthma admissions in 2019.

\* The proposal's use of weather data from Leeds Bradford Airport, which is not indicative of the Ryburn Valley, raises questions about the validity of the dispersion claims.

\* CVSH's past incidents, such as fires and flood risk, cast doubt on their ability to safely manage the incinerator.

\* The removal of the Council's authority to monitor compliance by requesting site diaries and inspection records is a significant concern. I strongly urge you to reject this application, as the potential hazards to our air quality and health are unacceptably high.

Sincerely,

XXXXX

725

To whom it may concern

I am writing to object about the proposed incinerator sowerby bridge.

It is unbelievable that this is still going on. No means no.

The biggest problem is the incinerator is in the lower valley therefore fumes and pollution linger,absolutely causing health issues.

The low lying land is subject to flooding,causing traffic disturbance,adding to pollution.

XXXXX

726	<p>Good afternoon, I would like to object to the application for a permit to be granted to incinerate waste in Sowerby Bridge. I am particularly concerned about the impact on the local air quality and the health impact of this on our residents. Air pollution hovers and collects in the hillsides therefore I am extremely concerned because of the geography of living in an area made up of valleys and hills this will impact on the widely on our whole area. On a more personal note my son already has Asthma and there are thousands on people with breathing health issues, who's health this could affect.</p> <p>Kind regards XXXXX</p>
727	<p>Ref. Caldrdale planning s13/006</p> <p>Hi calderdale planning</p> <p>I am at a loss as to why this planning application is still being debated.</p> <p>The incinerator would clearly be far too close to sowerby bridge. Which is a popular dining out, drinking and socializing area.</p> <p>As we all know the stench from the incinerators can be very potent and can carry for several miles during warm summer days (the type of days when people enjoy sitting out in beer gardens). This would be devastating to pubs and restaurants in this area. Who haven't had an easy ride over the last couple of years.</p> <p>This apart from the extra trucks often shedding toxic waste materials directly through the centre of sowerby bridge</p> <p>Surely the best idea would be to find a more suitable place not so close to a town</p> <p>Regards XXXXX</p>
728	SEE ATTACHMENT



729 Calder Valley Skip Hire Application for environmental permit for Schedule 13 small waste incineration plant ref S13/006

I strongly OBJECT to the application for an environmental permit. An Inspector, who was appointed by the Government, rejected the application on appeal so that should be the end of it. Something is seriously wrong with the system in that Calder Valley Skip Hire (CVSH) have been allowed to put in yet another application. The Government Inspector, John Woolcock, dismissed the appeal and states in his conclusion "I am unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment." How can you possibly allow this permit when our health is at risk.

I hope the director for Public Health has been involved in the discussions regarding this application, which flies in the face of your Climate Action plan and allowing the application will mean tonnes more carbon, gasses and particulates are emitted into the valley. These emissions will not disperse in this steep sided valley with regular inversions.

Issues of concern

Unknown impact on human health : harmful emissions

The modelling of air pollution does not satisfactorily represent the conditions in the valley even with rough surface calculations. The stack height is low, it does not even reach the level of Rochdale Road, the point of emission is below the houses on Rochdale Road and the mixing of air / dilution of pollution at the point of emission is unknown. There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on 1 particular model which does not allow for the topography, the woodland, the inversions in this valley.

Each report for air quality, uses terms like, estimates, projected, calculated based on a model of air distribution at Leeds/Bradford airport. Some parameters have been set with the agreement of CVSH which is inappropriate. The valley suffers from inversions which will keep the pollution in the air that we breathe at low levels. The stack height should be much higher in this location.

Is it really acceptable to allow a risk to human health levels of dioxins and furans are predicted to be higher in the area and yet these are only estimates. On this basis alone the permit should be refused. The flue is not high enough to achieve dilution - the risk to human health has not been adequately determined and the effect on human health will be SIGNIFICANT.

### Air quality

The addition of this significant amount of emissions to atmosphere will impact on air quality within the boundary. The data provided by the applicant shows much higher pollution levels at Spring hill mills area, this is due to prevailing wind conditions. Pollutants when they are able to disperse in the winter months will likely blow into the AQMA having a seriously detrimental impact on air quality within the AQMA and surrounding areas.

The original submission suggested that there won't be an increase in waste transfer in or out of site. This is incredulous. A business will operate to achieve maximum profit. It is profitable now bringing in waste sorting and moving waste to landfill. This operation will continue and the site will take in more waste to burn - numbers of vehicles to site will likely double if not triple. The effect on the AQMA will be SIGNIFICANT.

### Noise

The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door open for much of the time impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that during the day but especially at night.

### Flora and Fauna

Much has been made of the trees, which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact of hot gases on these trees, how these harmful chemicals will affect the local ecology? Deer roam the woods, badgers, cuckoos, the woods are alive with birds and animals, how is nature to be protected? The flue is not high enough to allow gases to escape and the environment will be harmed.

### Enforcement

CMBC have stated in the past that they have insufficient resources to ensure adequate enforcement, a severe lack of specialists to deal with such a site, how can the application be allowed if there is no one to enforce regulations?

### Probable amendment to hours of operation

As above the company will want to make profit, it is likely (more than likely) that they will want to extend operating hours which will further impact on the matters raised above.

#### REFUSAL ON THE GROUNDS:

- Inadequate dispersal and dilution of chemicals which are harmful to human health.
- The Stack height is inadequate
- Dilution is negatively affected by the location of the of the plant in the valley bottom
- Dispersal is negatively affected by the location of the emission point of the flue
- Dispersal is negatively affected by the trees
- Dispersal is negatively affected by inversions
- Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology.
- Opposes the aims of Calderdale's Climate Action Plan
- A Government Inspector has stated "I am unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment."

THE PERMIT SHOULD BE REFUSED – XXXXX

730	<p>I would like to object again to yet another application by CVSH for an incinerator at their site at Belmont, Rochdale Road, Sowerby Bridge. I took part in the original march from Sacred Heart school to the site at Rochdale Road about 8 years ago and nothing has changed. As a resident near proposed site this would still be detrimental to flora and fauna in the area and to air quality.</p> <p>Yours</p> <p>XXXXX</p>
731	<p>Hi</p> <p>Please add my objection to the others, No to Sowerby Bridge incinerator XXXXX Sowerby Bridge Resident</p>
732	<p>I have two young children, one of who suffers with a really bad chest, our small Town does NOT need this incinerator.</p>

733

Dear Planning Department,

I am writing to express my strong objection to the proposed use of the incinerator in Sowerby Bridge.

I have several concerns regarding the potential risks to air quality and health in our community.

Firstly, the 2023 Government Planning Inspector's refusal of the application due to concerns about the discharge of waste gases and their risks to the health of local people and the environment is a significant concern. Elected representatives and MPs have also opposed this application, reflecting the strong local objections.

Secondly, the proximity of the chimney to local schools, with 9 schools within 1 mile and 18 schools within 2 miles, raises serious concerns about the health of our children. The prevailing winds and steep-sided Ryburn valley may cause polluting gases to blow towards the center of the local population, particularly as the schools are above the proposed chimney height.

Thirdly, the proposal uses weather data from Leeds Bradford Airport, which is not representative of the local landform and wind patterns in the Ryburn Valley. In windless conditions, I frequently observe smoke and mist hanging for long periods in the valley. As I understand it, the Met Office has said they would be unable to support the application as they could not meaningfully assess conditions within the narrow and deep valley which are prone to inversions and cold air pooling.

Fourthly, there are reasonable doubts about CVSH's ability to operate an incinerator correctly, given the history of fires and flood risk. The incorrect postcode provided for a place not at risk of flooding further compounds these concerns.

Lastly, the removal of the Council's ability to request site diaries and inspection records to monitor compliance is deeply troubling. In light of these concerns, I strongly urge you to refuse this application. The potential risks to our air quality and health are simply too high.

Thank you for your time and consideration.

Yours Sincerely,

XXXXX

734 To whom it may concern,

As a local resident of Sowerby Bridge, I object in the strongest terms to the proposed incinerator on Rochdale Road.

Having already been refused by government planning inspector John Woolcock on the grounds that he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment" it is extremely disappointing that Calder Valley Skip Hire have submitted another application.

The computer modelling used by CVSH to argue against the risk to residents' health is flawed as it uses weather data from Leeds Bradford airport. The data is not comparable.

Sowerby Bridge suffers already from pollution due to the high flow of traffic through the town and is in an Air Quality Management Area just 670 metres downwind of the site.

There are several schools and day nurseries in close proximity to the site, causing concern for the health and wellbeing of local children.

If an environmental permit is granted, I strongly believe there will be a detrimental impact to the health of our community. Breathing clean air is a basic right.

The application for an environmental permit should be refused.

Yours Sincerely,

XXXXX

735

Hi,

I am emailing you to raise my objection to the above application for an environmental permit. I am concerned about the impact the proposed plant would have on the natural environment and to human health.

Kind regards,

XXXXX

736

Dear Sir.

As a local resident I wish to object in the strongest possible terms once again to Calder Valley Skip Hire's application to operate a waste incinerator on Rochdale Road, Sowerby Bridge.

- Firstly, Sowerby Bridge already suffers very poor air quality, indeed it is in an air quality management area such is the current pollution levels, therefore how on earth will operating a waste incineration site ½ mile up the road (and upwind) help in this case??
- Secondly, the height and proximity of the proposed smoke stack of the plant to the nearby trees & woodland mean that waste gases from the incinerator could not be discharged in a controlled manner which would safeguard human health & the environment.
- Thirdly, on a regular basis throughout the year mist & fog & smoke lie in the valley bottom throughout the year and inversion would surely stop waste gases from the incineration plant dispersing as is often seen after any fire in the valley. Such inversions are a common phenomena in our valley, so there must be better sights for a waste plant in other areas where such inversions don't occur.
- Lastly, Calder Valley Skip Hire needs to understand that this application has to be the last and that no further applications will be allowed.

Yours Faithfully,

XXXXX



737 I wish to object about the application for an environmental permit for schedule13 small waste incinerator plant ref S13/006

Sowerby Bridge is already suffering from pollution. It is in an Air Quality Management Area and is only 670 metres downwind of the incinerator.

Smoke and mist regularly lie in the valley bottom and inversion can stop waste gases dispersing as shown by photographs of the aftermath of fires in the valley. This throws considerable doubt on the validity of the air quality.

The Government Inspector said that given the height and proximity of the smoke stack to trees and woodland he was: "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment"

I'm from a generation of people who lived in the valley when mills belched fumes into the air. Every family had at least one member with breathing problems. Then the mills closed, the air became cleaner and people were healthier. Please do not reverse this by allowing poisonous fumes back into our beautiful valley.

Breathing clean air should be a basic right of any community.

Please acknowledge receipt of this objection.

Yours faithfully,

XXXXXX

738 Please can I add my name to the chorus of objections to this plan.

There will no doubt be multiple objections based on the issue of siting something which has the potential to emit noxious fumes on a valley floor. The studies on this and the meteorological findings hopefully provide enough evidence to show that this is a bad idea.

My objection in addition is that a second application has been submitted so soon after the first was rejected. How many times do we have to fight this battle?

Regards,

XXXXX

739

XXXXX

Subject:

Objection to the Proposed Incinerator at Rochdale Road, Sowerby Bridge

Hi,

I am writing to express my strong objection to the proposed construction of an incinerator at Rochdale Road, Sowerby Bridge, which is alarmingly close to our residential community. The decision to place such a facility within proximity to homes where families reside is not only inconsiderate but also poses significant health and environmental risks.

First and foremost, the emissions from incinerators are a major concern. They contain harmful pollutants such as dioxins, furans, mercury, and particulate matter, which can have detrimental effects on human health, particularly on the respiratory system.

The World Health Organization has classified some of these substances as carcinogenic, and their presence in our air could increase the risk of cancer and other serious illnesses among residents.

Furthermore, the environmental impact cannot be overlooked. Incinerators contribute to air, soil, and water pollution, and they undermine recycling efforts by burning materials that could otherwise be reused or recycled.

The long-term ecological damage that could result from the incinerator's operation is unacceptable. Additionally, the quality of life in our community is at stake.

The presence of an incinerator would likely lead to increased traffic from waste transport vehicles, noise pollution, and a decrease in property values.

These factors combined would erode the peaceful and safe atmosphere that our neighborhood has always cherished. In light of these concerns, I urge you to reconsider the placement of the incinerator. There are alternative waste management solutions that are more environmentally friendly and pose less risk to public health, such as recycling and composting programs, which I strongly advocate for.

I hope that you will take the voices of our community into account and make a decision that prioritizes the health and well-being of its residents. We are prepared to support this matter through all necessary means, including legal action if required.

Thank you for your attention to this urgent matter. I look forward to your prompt response.

Sincerely,  
XXXXX

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I am writing to express my strong objection to the proposed construction of an incinerator at Rochdale Road, Sowerby Bridge, which is alarmingly close to our residential community. The decision to place such a facility within proximity to homes where families reside is not only inconsiderate but also poses significant health and environmental risks.

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The presence of an incinerator would likely lead to increased traffic from waste transport vehicles, noise pollution, and a decrease in property values.

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I hope that you will take the voices of our community into account and make a decision that prioritizes the health and well-being of its residents. We are prepared to support this matter through all necessary means, including legal action if required.

Thank you for your attention to this urgent matter. I look forward to your prompt response.

Sincerely,  
XXXXX

741

I have two objections

1. The smoke in certain weather conditions will hang in the bottom of the steep sided valleys in the area where most of the traffic pollution already hangs. I know the incinerator is supposed to burn cleanly but with human error and only a short time of faulty burning the pollutants could linger a long time.

2. An employee (or maybe one of the owners) of Calder Valley Skip Hire once decided they could not wait a few seconds for me to speed up in the 20mph zone near the industrial estate at Mytholmroyd and overtook my car in their skip lorry. This was right at the junction where school children walk down to the main road. From this it seems at least one of the drivers who work there is antisocial. I'm worried such a person might be put in charge of the incinerator.

Sent from my iPhone

742

Good afternoon,

I would like to strongly object to the plans for the incinerator, with reference S13/006.

I live in sowerby bridge and have a young family, you would be severely compromising our health and that of everyone in our local community. Including the staff at the site itself, workers in the adjacent industrial estate and throughout the whole of sowerby bridge.

There is a primary school just a stone throw away from this site, and a high school not much further away. It would be criminal to agree to polluting the air of hundreds of local children, what long term damage would this do to their health?

We should be working towards giving our children cleaner air, not going back in time and polluting it!!

I urge you to regret this application.

Yours sincerely,

XXXXX

743 I object to the proposed incinerator in the Ryburn valley on environmental grounds. The valley already suffers from high levels of pollution from heavy traffic on the A58. The incinerator would add to this greatly. The topography of the Ryburn valley often leads to smog staying in the valley all day and the local residents should not have their health out at any more risk. This application has already been refused once. It must be refused again, and for good this time.

Yours sincerely,

XXXXX



744 Dear Calderdale,

I am writing to formally object to the proposed operation of the incinerator in Sowerby Bridge based on the following grounds:

In July 2023, a Government Planning Inspector rejected the application for the incinerator citing concerns about the discharge of waste gases and the associated risks to the health of local residents and the environment. This decision underscores the serious nature of the potential impacts on our community.

All elected representatives and Members of Parliament have voiced their opposition to this application, reflecting the strong local objections to the project. It is important to recognise that breathing clean air is a fundamental right that must be preserved for the well-being of our community.

The emissions from the incinerator chimney are likely to be concentrated at ground level, affecting all residents in the vicinity. With nine schools located within a one-mile radius and a total of 18 schools within two miles of the chimney, the health implications for our children and residents are significant. Notably, the schools closest to the incinerator are situated above the proposed chimney height, raising concerns about exposure to harmful pollutants. Additionally, the proximity of a public footpath to the site further heightens the potential risks to public health.

The proposal relies on data from the weather station at Leeds Bradford Airport to demonstrate that the gases will disperse effectively. However, the geographical differences between the airport location and the Ryburn Valley, characterised by its steep-sided terrain and prevailing winds, suggest that emissions are more likely to be directed towards the central population area. Residents have reported instances of smoke and mist lingering in the valley for prolonged periods during windless conditions, indicating a potential threat to air quality.

There are legitimate doubts regarding the ability of CVSH to operate the incinerator safely and responsibly. Past incidents of fires and the documented flood risk associated with the site raise concerns about the operator's track record. Furthermore, inaccuracies such as providing the wrong postcode in the application indicate a lack of attention to detail and compliance with regulations.

Of particular concern is the removal of the Council's ability to request site diaries and inspection records to monitor compliance with regulations. This lack of transparency and oversight raises doubts about the operator's commitment to

ensuring the safe operation of the incinerator and protecting the health of the community.

In light of the significant risks posed to our air quality and public health, I urge you to refuse this application. The well-being of our community should be paramount, and the potential consequences of allowing the incinerator to operate are simply too high.

Thank you for your attention to this matter. I trust that you will give due consideration to the objections raised by concerned residents and make a decision that prioritizes the health and safety of the community in Sowerby Bridge.

Yours sincerely,

XXXXX

745 Dear Sirs,

I object in the strongest possible terms to the renewed application for a permit to operate a waste incinerator at Belmont, or anywhere else in the Calder Valley. The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience. This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

Two years ago the said company who is applying for an incinerator at Belmont. I remember when they had a fire and our car which was parked at Flowerbank St Peter's Avenue it was covered in flies as was other cars. Also the fumes that we had to invest was not healthy at all.

I myself suffer from a chest ailment it was not good for my health. The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result. Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets. Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop.

The Council should abide by the previous decision of the Government Planning Inspector of 5th July 2023 and the decision of the judicial review, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Yours faithfully

XXXXX

746

Dear Sir or Madam

I object to the proposed Sowerby Bridge Incinerator as it will decrease the air quality and due to the site being in a steep valley the air will clear very slowly.

Regards

XXXXX

747

Hello,

I am emailing to register my objection to Calder Valley Skip Hire Ltd (CVSH)'s application for an environmental permit for a new small waste incineration plant (SWIP) at a site in Sowerby Bridge, West Yorkshire.

This application is a resubmission of an application that has already been refused at appeal Jul23 by Mr Woolcock, a Government Planning Inspector. The application is largely unchanged and the computer model that is used to support it does not use local weather data. There is absolutely no assurance therefore that the conclusion of the Mr Woolcock is still not a real material concern. He stated that given the height of the stack and its siting close to trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment".

Sowerby Bridge is already an Air Quality Management Area and suffers from pollution. It is downwind of the incinerator and regularly shows inversion where vapours lie in the valley bottom and don't disperse. This isn't taken into account by the CVSH modelling and does not accurately predict the flow of waste gases through the trees and valley.

If there is any doubt that this SWIP isn't going to increase pollution for the residents of Sowerby Bridge then the Environmental Permit should be refused. I am really concerned about the public health of the area, particularly the children. Poor air quality has strong and long lasting impacts on children's health. I am also concerned that due to climate change and more intense downpours there is increased chance of the SWIP contaminating the river and water sources. The Council's decision on this environmental permit needs to align with Calderdale Council's other strategic objectives in Public Health, Education achievement and the Climate Action Plan.

It seems to be that there is very strong doubt that the SWIP in the proposed site will affect air quality and other environmental standards and therefore this application should be refused and a better site sought.

Thank you

XXXXX

748

Dear sir,

I am writing to voice my strong opposition in regard to the resubmitted application for the incinerator on Rochdale Rd. I previously submitted objections in advance of the appeal that was refused and consider that Calder Valley Skip Hire is acting recklessly in pursuing this re-application- they clearly have no concern for the health and well-being of the local community given the decision by the inspector in July 2023.

The proposed site for this incinerator is entirely inappropriate- proximity to residential properties and the town centre poses a significant risk. The topography of our steep sided valley creates specific conditions that result in inversion trapping emissions and preventing them being dispersed as stated by the inspector John Woodcock. This is exacerbated by the wooded landscape which is itself a haven for people and wildlife and needs protection not decimation.

The air quality in our valley is already compromised by the highly congested A58 - this major road would be subjected to yet more traffic congestion with waste wagons queuing to enter the site. The notion that a waste site in our valley can legitimately operate 24 hours a day without significant threat to our health is our valley is totally flawed.

Finally, the removal of monitoring access to incinerator records for CMBC in the re-submission is a sinister indication of the company's attitude to the welfare of the local population.

All local councillors and two local MPs have consistently opposed this installation and operation from the start. It's time the voice of the local community was heard and this proposal quashed once and for all.

Yours faithfully  
XXXXXX

749

Dear Calderdale,

I am writing to formally object to the proposed operation of the incinerator in Sowerby Bridge. The concerns raised about the discharge of waste gases and their potential risks to the health of local people and the environment are significant and cannot be overlooked.

As you may be aware, in July 2023, a Government Planning Inspector rejected the application for the incinerator due to valid concerns regarding the impact on air quality and public health. Furthermore, all elected representatives and Members of Parliament have opposed this application, reflecting the strong local objections that exist within the community.

Breathing clean air is a fundamental right that should be safeguarded for all members of our community. The proximity of the incinerator to residential areas, including nine schools within a mile and 18 schools within two miles, raises serious concerns about the potential health implications for our children and residents.

The unique topography of the Ryburn Valley, coupled with prevailing winds, poses a significant risk of emissions being concentrated within the local population centre rather than being dispersed as suggested by the data from the weather station at Leeds Bradford Airport. This discrepancy raises doubts about the accuracy of the information provided in the application.

Additionally, the track record of CVSH raises concerns about their ability to operate the incinerator safely and responsibly, given the incidents of fires and a documented flood risk. The inaccuracies in the application, such as providing the wrong postcode for the location, further erode confidence in the project.

Of particular concern is the removal of the Council's ability to request site diaries and inspection records to monitor compliance. This lack of transparency and oversight raises red flags about the accountability of CVSH in ensuring the safe operation of the incinerator.

In light of these substantial risks to our air quality and public health, I urge you to reject this application. The potential consequences of allowing the incinerator to operate are simply too high, and the well-being of our community must take precedence.

Thank you for your attention to this matter. I trust that you will carefully consider the objections raised by the community and make a decision that prioritises the health and safety of the residents of Sowerby Bridge.

Yours sincerely,

XXXXX



750

Dear Calderdale

I strongly object to the proposed operation of the incinerator in Sowerby Bridge. It is concerning that the Government Planning Inspector refused the application in July 2023 due to concerns about the discharge of waste gases and their risks to the health of local people and the environment. All elected representatives and MPs have opposed this application, reflecting strong local objections. Breathing clean air is a basic right that should be protected for our community, and it is worrying that polluting gases from the chimney will not be dispersed above the level of the houses along the valley and hillsides but will be in the air breathed by all who live here.

What makes it worse is that there are 9 schools within 1 mile and 18 schools within 2 miles of the chimney. The schools in close proximity are all above the proposed chimney height. A public footpath runs close to the site. Calderdale had the highest rate of respiratory tract infections in West Yorkshire for infants under one year in 2016 & asthma admissions in 2019.

The proposal uses data from the weather station at Leeds Bradford Airport to show that the gases will be dispersed. This is nowhere near the Ryburn Valley and the landform is completely different. The steep-sided Ryburn valley and prevailing winds mean that emissions will frequently blow towards the centre of the local population. In windless conditions, local residents regularly see smoke and mist hanging for long periods in the valley.

There are reasonable doubts as to whether CVSH would operate an incinerator correctly. Already, there have been several fires and there is also a flood risk. It is worrying that CVSH have shown the wrong postcode on the application for a place not at risk of flooding.

What's worse is that the application removes the Council's ability to request site diaries and inspection records to monitor compliance. This is unacceptable, and I urge you to refuse this application. The risks to our air quality and health are simply too high.

XXXXX

751

Dear Calderdale,

I am writing to formally express my strong objection to the proposed operation of the incinerator in Sowerby Bridge. The concerns surrounding the discharge of waste gases and their potential risks to the health of local residents and the environment are grave and require urgent attention.

In July 2023, a Government Planning Inspector rejected the application for the incinerator citing valid concerns about the impact of waste gases on the health of the community and the environment. Additionally, all elected representatives and Members of Parliament have voiced their opposition to this application, reflecting the widespread local objections. Preserving the right to breathe clean air is a fundamental necessity that must be upheld for the well-being of our community.

The emissions from the incinerator chimney are alarming as they will not disperse above the level of the surrounding houses, valleys, and hillsides, but rather will be inhaled by all residents in the vicinity. With nine schools located within a one-mile radius and 18 schools within a two-mile radius of the incinerator, the potential health risks to our children and residents are significant. Moreover, the proximity of these schools to the proposed chimney height raises further concerns. The presence of a public footpath near the site adds to the urgency of this matter, especially considering the high rates of respiratory tract infections and asthma admissions in Calderdale, particularly among infants and young children.

The reliance on data from the weather station at Leeds Bradford Airport to demonstrate the dispersion of gases is misleading, as the topography and prevailing winds in the Ryburn Valley differ significantly from those in the vicinity of the airport. The unique geography of the Ryburn Valley, combined with local weather patterns, indicates that emissions are likely to be concentrated towards the central population area, posing a direct threat to public health. Residents frequently witness smoke and mist lingering in the valley for extended periods during windless conditions, further underscoring the potential risks associated with the incinerator operation.

Furthermore, there are legitimate concerns regarding the operational competence of CVSH in managing the incinerator safely and responsibly. The history of several fires and the documented flood risk associated with the site raise doubts about their ability to ensure the safety of the community. Moreover, the inaccuracies in the application, such as providing the wrong postcode for a location not at risk of flooding, highlight the need for closer scrutiny of the project.

Of particular concern is the removal of the Council's ability to request site diaries and inspection records to monitor compliance, which raises questions about transparency and accountability in overseeing the incinerator operation. Given the significant risks posed to our air quality and public health, I urge you to reject this application promptly. The potential consequences of permitting the incinerator to operate are far too great, and the health and safety of our community must take precedence.

I trust that you will give due regard to the concerns raised by the community and make a decision to reject the application so that you continue to safeguard the well-being of the residents of Sowerby Bridge.

Sincerely,

XXXXX

752

Good afternoon,

I am writing to object to Schedule 13 small waste incineration plant. Ref: S13/006

I write as a resident, business owner, parent, community activist, as all of these facets of my life will be adversely affected by the granting of an environmental permit to this company: I live, work, send my child to school, and engage in community building activities all within a mile of the proposed site.

Poor air quality is accepted at both local and national level as being a key factor in both the health and prosperity of a population. However, almost all action is framed as individual responsibility, eg regarding vehicle use and wood burning stoves. There seems to be little impetus for council or government to restrict the role of industry in this burden, else incineration would not even be considered due to the increase of contaminants that even the most efficient incinerators create.

It is widely acknowledged that air quality in Sowerby Bridge is abysmal. Having sat through days of 2 public inquiries regarding this proposal, I can tell you that the aq levels are at best borderline for even considering this proposal; if they were any higher the answer would simply be "no".

In March 2024, the EU released a press release stating: "representatives reached a provisional political agreement on a proposal to set EU air quality standards to be attained with the aim of achieving a zero-pollution objective, thus contributing to a toxic-free environment in the EU by 2050. It also seeks to bring EU air quality standards in line with the World Health Organization (WHO) recommendations."

Although we are no longer bound by EU legislation, it is not inconceivable that UK law will continue to be indexed to EU levels (especially as we are in an election year). Were the safe levels proposed by the WHO in place now, this application would not even be considered.

So if what is currently deemed "safe" is in a few scant years designated "unsafe", how do we recover our health? Would the incinerator be closed down at that point, or would people just be encouraged to go places on foot/bike more?

In his conclusion to the last public inquiry, HM inspector John Woolcock stated:

" I have taken into account all other matters raised in the evidence but have found nothing to outweigh the main considerations that lead to my conclusions. I am unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment."

Since he made this report, nothing has materially changed in the CVSH application. Beyond felling extensive areas of mature woodland, there is little that CVSH could do to improve the issues that he raised about tree height and the impact of woodland with regards to air circulation.

The plotting of impact on air quality of this incinerator is - as we know - based on weather data situated at Leeds-Bradford airport. Met office info on Ryburn Valley weather data is non-existent with a recent request being met with the following rejection:

" That is a very narrow, deep valley (~500m wide) that simply will not be resolved by our analyses or NWP (2km). We could not meaningfully assess conditions within that valley. Meteorological convention would suggest that valley would be prone to inversions/cold air pooling."

If there is no weather data for the Ryburn Valley, the impact of the weather on this incinerator - which has always been of prime consideration throughout - can't be properly considered. Without this site-specific data, the impact is a mere guess. Your work here pretty much amounts to:

- Is it safe?
- Dunno, possibly.

So much of the safety of this installation comes down to the operator. Two thirds of all incinerators in the UK are never visited or inspected or monitored without a pre-arranged visit. With hugely over-stretched resources in the public sector it is extremely likely that the EA and Calderdale Council would be unable to properly monitor this site with the rigor and element of surprise needed to keep the public safe.

The operator has a long history of violating the terms of their licence, as plotted and documented by residents living in the vicinity. But no action has ever been taken. They have frequent fires to burn waste, they frequently work and generate noise at antisocial hours, and keep stacks of waste untethered that blow into the river. But no action has ever

been taken. The river Ryburn - which flows just behind my shop so i observe it regularly - often has debris and waste which is quite probably coming downstream from CVSH. But no action has ever been taken.

We know that the council has long and important contracts with CVSH. Could there be a conflict of interest in prosecuting or investigating the violations because they are council contractors, so it would "look bad"?

And yet this is the process that we as residents are supposed to rely on in keeping us safe. This is the process that we have to assume will stop our water becoming more polluted, our air non- toxic and our health and wellbeing as the primary motivator. Hardly reassuring.

The actual functionality of the incinerator in situ has also been called into question. Engineers have stated that it is simply not possible for them to carry out the activities in the space as suggested. What is worrying is that as the current design stands, it will either have to be operated less thus not meeting safe thresholds, or the staff will be put in serious risk of harm. It hardly screams competence.

Finally, the property where my business is sited - XXXXX - is a flood affected property. Despite being flooded multiple times, no work or assesment has ever been carried out by the EA to relieve flooding on the river Ryburn. The river bed is considerably higher than it was even a decade ago and yet nothing has been done to combat it.

Being in close contact with the river, it is my opinion that NO DEVELOPMENT should be allowed along the river Ryburn until a full assessment of the river has been done by the EA. There is definitely no way that a development of this scale would be allowed on the Calder, which is vigorously monitored.

For all the above reasons, I believe the environmental permit should not be granted. Lack of data, lack of scrutiny, goes against council and government objectives on aq and waste management, flood risk.

Many thanks for your time,

XXXXX

753

Dear Sirs

I live directly opposite the proposed incineration site and wish to register my objection to the application yet again.

My family had lived in this property for nearly 20 years and never has the “atmosphere” noise, general vermin been worse than since CVSH set up business, they are supposed to keep to agreed operating hours - this doesn't happen.

I object on the following grounds.

Environmental Impact:

- a. The proposed incinerator will undoubtedly have severe adverse effects on the delicate ecosystem of the valley. The emission of harmful pollutants such as particulate matter, dioxins, and heavy metals will pose a significant threat to air quality, soil health, and water sources in the area.
- b. The narrow topography of the valley exacerbates concerns regarding air pollution dispersion. Pollutants emitted from the incinerator are likely to be trapped within the valley, leading to heightened health risks for residents and wildlife.

Public Health Concerns:

- a. The emission of toxic substances from the incinerator poses grave health risks to residents living in close proximity. Studies have consistently linked exposure to incinerator emissions with respiratory diseases, cardiovascular issues, and various forms of cancer.
- b. Given the valley's narrow confines, there is a heightened risk of pollutants settling in the atmosphere, leading to prolonged exposure for inhabitants. This is particularly concerning for vulnerable populations such as children, the elderly, and those with pre-existing health conditions.

Infrastructure Strain:

- a. The proposed incinerator will inevitably lead to increased traffic congestion due to the transportation of waste materials to and from the site. The narrow roads within the valley are ill-equipped to handle such heavy traffic, posing safety hazards and disrupting the daily lives of residents.

Community Well-being:

- a. The construction and operation of an incinerator in close proximity to residential areas will have a detrimental impact on the quality of life for local residents. Noise pollution, odors, and visual blight associated with the facility will diminish

the aesthetic appeal of the valley and erode the sense of community.

Conclusion.

How can a previously rejected on appeal application be reconsidered when nothing has changed?

Hopefully those people who will be making decisions that will affect everyone in the Ryburn and Calder valleys, along with the surrounding areas, will have read all the proven and published official studies, not just in the uk but from around the world and they will refuse planning permission.

Why?

Simply because they believe people's lives and health come first...

Yours sincerely

XXXXX



754 As a Ripponden resident I wish to object to the application for a permit to operate a waste incinerator in Sowerby Bridge

Please register my objection formally.

Many thanks

XXXXX

755 Dear Sir/Madam,

I am writing to object to the proposed construction of an incinerator by Calder Valley Skip Hire, in Sowerby Bridge. I am alarmed to see yet another application of this kind following the dismissal of the previous application by both Calderdale Council and the Government.

There is no information in the consultation documents about the possible lifespan of the incinerator and for how many years/decades it is planned that it will be operational. This brings into question the safety of many of the assumptions made in the draft decision document as there is no timeframe for the operation of the permit, no recognition that monitoring of the incinerator and other relevant standards may change – and no mechanism for ensuring that the permit may need to be reconsidered or reviewed or operations at the incinerator changed.

There is no detailed information about criteria, standards and timescale that must be met when the incinerator, if it goes ahead, is eventually decommissioned. This is gravely concerning; particularly given the acknowledged contamination of the land the incinerator will create and that it will not just be an eyesore but also a derelict eyesore in the valley.

I am further concerned at the lack of clarity and process relating to how the Environment Agency may monitor emissions being released from the site and how they may carry out effective enforcement action, should the applicant be in breach of any permitted rights that may be granted.

The air quality in the Sowerby Bridge is already poor. I am concerned that additional emissions from this incinerator might add to the already high levels of toxins in some people, causing illness. I am particularly concerned about the negative health impact on infants and young children.

Highlighting this point, the potential impact on people's health of the incineration process cannot be ignored. Back in 2018 and 2019, Public Health England funded a study to examine emissions of particulate matter from incinerators and their impact on human health. The study found that, while emissions of particulate matter from waste incinerators are low and often make a small contribution to ambient background levels, they make a contribution, nevertheless.

A further feature of this particular permit application is that the operator of the proposed SWIP appears to have no

experience of operating a waste incineration facility.

In light of all such matters, I find myself unable to support such an application.

Kind regards,

XXXXX

756 To Whom It May concern:

I wish to object to the application for an Environmental Permit for a Small Waste Incineration Plant at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge, West Yorkshire, HX6 3LL.

I grew up in Sowerby Bridge at XXXXX, and regularly return to visit my parents (XXXXX). Their house is just up the road from the proposed incineration site at the valley bottom, and I would like it noted that I agree with the objection reasons stated in the email from my father XXXXX, and of their neighbour XXXXX (both at XXXXX). I attended the public meeting about the incineration application on Saturday 23rd March at Foundry Street Community Centre in Sowerby Bridge, which was extremely well attended - there is huge opposition to this going ahead for the following reasons, which are outlined in much greater detail on the emails you will have received from XXXXX, amongst many others:

- Noise
- Flooding risk which would result in pollution to the river Calder
- Woodland damage to the trees due to the stack height of the chimney
- Air Pollution and consequent negative impact on health of residents
- Increased traffic and congestion to an already busy Sowerby Bridge
- Competence of Applicants / Process
- Data Modelling not being relevant for the proposed site; location being unsuitable due to being in a valley bottom

The straightforward solution would be for CMBC to refuse this application or admit they cannot act independently and make no decision on it. Either decision would allow the applicant the opportunity to take the matter back to the Secretary of State.

Regards

XXXXX

757

XXXXX

Subject:

Objection to the Proposed Incinerator at Rochdale Road, Sowerby Bridge

Dear Sirs

I am writing to express my strong objection to the proposed construction of an incinerator at Rochdale Road, Sowerby Bridge. This site lies in the bottom of a steep sided valley within the Ryburn Valley in a predominantly residential rural area. The decision to place such a facility within close proximity to homes where families reside is not only inconsiderate but also poses significant health and environmental risks.

First and foremost, the emissions from incinerators are a major concern. They contain harmful pollutants such as dioxins, furans, mercury, and particulate matter, which can have detrimental effects on human health, particularly on the respiratory system.

The Government Inspector said that given the height and proximity of the smoke stack to trees and woodland he was;

'Unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment'

Surely this should be sufficient for Environmental Health Officers to take cognisance of?

In addition the World Health Organization has classified some of these substances as carcinogenic, and their presence in our air could increase the risk of cancer and other serious illnesses among residents.

Furthermore, the environmental impact cannot be overlooked. Incinerators contribute to air, soil, and water pollution, and they undermine recycling efforts by burning materials that could otherwise be reused or recycled.

The long-term ecological damage that could result from the incinerator's operation is unacceptable. Additionally, the quality of life in our community is at stake.

It would appear that the health and wellbeing of people where there is a question internationally over the emissions from

incinerators being harmful to health Calderdale Council Officers are not interested. It begs the question why?

The presence of an incinerator would likely lead to increased traffic from waste transport vehicles and noise pollution. To be economically viable it would require to operate 24 hours a day and this would involve importing waste from outside Calderdale. This incinerator has always been about a 'licence to print money' by the operators and health and wellbeing of the population an unimportant factor.

These factors combined would erode the peaceful and safe atmosphere that our neighborhood has always cherished. In light of these concerns, I urge you to reconsider the placement of the incinerator. There are alternative waste management solutions that are more environmentally friendly and pose less risk to public health, such as recycling and composting programs, which I strongly advocate for.

I hope that you will take the voices of our community into account and make a decision that prioritizes the health and well-being of its residents. I fully support this matter through all necessary means, including legal action if required.

Thank you for your attention to this urgent matter. I look forward to your prompt response.

Sincerely,  
XXXXX

758 I strongly object to the proposed Incinerator at the Belmont site in Sowerby Bridge.

Recently, additional information has become available which is further evidence that the Incinerator without doubt should not be built & operated on the proposed site or anywhere else in the Ryburn Valley.

The Met Office in their recent reply to a series of questions from a local objector state that ....a senior data scientists says "...that is exactly the kind of application we cannot support. That is a very narrow, deep valley (500m wide) that simply will not be resolved by our analyses or NWP (2km). We could not meaningfully assess conditions within that valley. Meteorological convention would suggest that the valley would be prone to inversions/cold air pooling."

It is clear that data has not been obtained by the applicant for the Incinerator: postcode HX6 3LL, not can it be meaningfully assessed/obtained.

This is definite evidence that the gases that would be discharged from the chimney stack would cause pollution. This is entirely unacceptable and backs up the Government planning Inspector's view when he refused the application last July. Please do not now or ever allow the building or operation of an Incinerator in the Ryburn Valley.

The decision by the Government Planning Inspector in 2023 to refuse the proposal, was made on the grounds that it could not be shown that waste gases would be discharged in a controlled way as to safeguard human health. What better grounds are there for Calderdale to refuse this new application now ? Waste gases from the chimney will add to the air pollution in the area, already too high and a recorded danger to health, particularly to children.

The applicants' evidence that the discharge would be safe is based on computer modelling which uses meteorological data from Yeadon, a very long way from the site, with a totally different landform. The Belmont site is in a very narrow valley in which mists regularly remain for some time, and smoke from fires ( at the waste recycling site run by the applicant ) has been recorded as remaining for some time in the valley and not dispersed. The chimney stack is surrounded by thick woodland which hinders dispersal. 18 schools and a large number of residential properties within 2 miles of the stack are above the height of the chimney and the long plume can be in any direction. There is already an oversupply of incinerators; waste should be recycled, not burnt.

I understand that the Council, though all the Councillors and the local MPs are opposed to the Incinerator, have passed

the decision on to Environmental Health Officers. Surely this is not right. The issue is extremely important to the whole population of Sowerby Bridge, the surrounding hillsides, the Calder Valley and the Ryburn valley and should be decided by elected representatives.

The decision must be to refuse permission; the community has a right to breathe clean air.

XXXXX

759

Dear Calderdale,

I am writing to express my deep concern regarding the proposed operation of the incinerator in Sowerby Bridge. As a member of this community, I believe that we have the right to breathe clean air and that our health and safety should be a top priority. It is troubling to hear that the Government Planning Inspector refused the application in July 2023 due to concerns about the discharge of waste gases and their potential risks to the health of local people and the environment. Additionally, I understand that all elected representatives and MPs have opposed this application, which reflects strong local objections. The fact that there are 9 schools within 1 mile and 18 schools within 2 miles of the chimney is particularly concerning. The proximity of these schools to the proposed incinerator heightens the risk of pollution to the children and staff who attend them.

Furthermore, Calderdale had the highest rate of respiratory tract infections in West Yorkshire for infants under one year in 2016 and asthma admissions in 2019. I have reasonable doubts about the accuracy of the data used in the proposal to show that the gases will be dispersed, as the weather station at Leeds Bradford Airport is nowhere near the Ryburn Valley.

The steep-sided Ryburn valley and prevailing winds mean that emissions will frequently blow towards the centre of the local population. In windless conditions, local residents regularly see smoke and mist hanging for long periods in the valley. Moreover, there have already been several fires at the site, and there is also a flood risk.

It is worrying that CVSH has shown the wrong postcode on the application for a place that is not at risk of flooding. Finally, I find it unacceptable that the application removes the Council's ability to request site diaries and inspection records to monitor compliance.

This lack of accountability could lead to potential violations of regulations and harm to the community. I urge you to refuse this application, as the risks to our air quality and health are too high. Thank you for your attention to this matter.

Yours Sincerely,

XXXXX

Sent from my iPhone



760 Calder Valley Skip Hire small waste incineration application Ref S13/006

### Objection

I write to object to the above application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

My primary concern is effect of this proposed incineration on the air quality in the Ryburn Valley and Sowerby Bridge

The site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution.

The site is at risk of flooding

There has been insufficient site modelling where temperature inversions are common and wind direction in the valley is complex to predict.

### Issues of concern

#### 1. Harmful emissions

In July 2023, John Woolcock, the Government Planning Inspector, said that given the height and proximity of the smokestack to the trees and woodland he was:

“unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment.”

The modelling of air pollution does not use local weather data. The flow of waste gases through the trees cannot be accurately predicted by the computer simulation.

The stack height is low, the point of emission is near level with the houses on Rochdale Road and the mixing of air /

dilution of pollution at the point of emission is unknown.

There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on one model which does not allow for the topography, the woodland, the inversions in this valley.

Each report for air quality uses estimates calculated based on a model of air distribution at Leeds airport. Some parameters have been set with the agreement of CVSH which is inappropriate.

The valley suffers from inversions which will act as a blanket - keeping the pollution in the air at low levels. The stack height should be much higher in this location.

For the concern about emissions alone this application should be refused.

## 2. Air quality

The addition of the emissions to atmosphere will impact on air quality within the boundary. The data provided by the applicant shows much higher pollution levels at Spring Hill Mills area, this is due to prevailing wind conditions. Pollutants when they can disperse in the winter months will likely blow into Sowerby Bridge – already an Air Quality Management Area (AQMA) only 670 metres downwind of the incinerator.

The original submission suggested that there won't be an increase in waste transfer in or out of site. This cannot be true. A business will operate to achieve maximum profit. It is profitable now bringing in waste sorting and moving waste to landfill. This operation will continue, and the site will take in more waste to burn - numbers of vehicles to site will certainly increase significantly. The effect on the AQMA will be significant.

## 3. Noise

The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door opens for much of the time impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that during the day but

especially at night.

#### 4. Flora and Fauna

Much has been made of the trees which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact of hot gases on these trees, how these harmful chemicals will affect the local ecology? Deer roam the woods, badgers, cuckoos, the woods are alive with birds and animals, how is nature to be protected? The flue is not high enough to allow gases to escape and the environment will be harmed.

#### 5. Enforcement

This new application has removed the sentence "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time". This will remove much of the Council's ability to monitor compliance in the operation of the incinerator. In addition, CMBC has been threatened with litigation by CVSH, how so can they then take enforcement action against them now?

For all the reasons outlined above I believe that this application must be refused. The health and environmental damage this incinerator will inflict are so significant that it cannot be approved.

Thank you for considering my objection.

XXXXX

Sent from Mail for Windows

761 Small Waste Incineration Plants (SWIP) emit particulate matter (PM10m and PM2.5m) composed of sulphur dioxides, carbon oxides, nitrogen oxides, heavy metals and a variety of complex organic compounds such as polychlorinated biphenyls (PCB's) and furans. Many of which cause respiratory problems, are strongly associated with cancer, are mutagens and have a long-lasting impact on reproductive health, causing congenital defects as well having a significant impact on environmental health through bioaccumulation. Whilst emissions from a modern SWIP are thought to be minimal – the long-term impact of such, is not yet know. To place a SWIP in the base of a steep sided valley in an urban area which already suffers from air pollution, is entirely irresponsible – emissions from such can only add to the current problem and increase the risk of disease in the local population in this highly populated area which has several schools and nursery's withing walking distance of the site. In addition, the information provided by Calder Valley Skip hire re environmental conditions is taken from an air monitoring site, more than 20km away and has no relevance to the current proposal. This is however only part of the problem; waste incineration produces large quantities of filter ash, which is highly toxic, containing high concentrations of all the above-mentioned chemicals. Currently the only route for disposal is via landfill – whilst the waste is now significantly less voluminous than pre incineration, it is significantly more toxic and has been proven to leach into groundwater polluting the local environment and further afield. As such waste incineration is considered a costly mechanism of dealing with waste. The potential energy generated is negligible and the only winner is the business implementing the incinerator, who benefit considerably from the profits they raise by charging clients for waste disposal. As such I am vehemently opposed to the implementation of a SWIP in Sowerby Bridge and I cannot understand why when the proposal has already been rejected due to environmental conditions, Calder Valley Skip Hire have been allowed to submit this proposal...is this ever going to end?  
XXXXXX

762 To whom it may concern,

I am writing to express my strong objection to the proposed establishment of an incinerator in Sowerby Bridge. As a concerned local resident, I am deeply worried about the potential detrimental effects this facility could have on our community's air quality, environment, and public health.

Incinerators are known to emit harmful pollutants into the air, including particulate matter, heavy metals, and toxic chemicals. These pollutants have been linked to a range of serious health issues, including respiratory problems, cardiovascular diseases, and even cancer. Given the proximity of residential areas to the proposed site, the risk of exposure to these pollutants is a grave concern for myself and my fellow residents.

Furthermore, Sowerby Bridge is renowned for its picturesque surroundings and natural beauty. The introduction of an incinerator in our town threatens to compromise our environment, air quality, and overall quality of life. It is essential that we prioritize the protection and preservation of our local environment for the benefit of current and future generations.

I urge the council to carefully consider the potential long-term consequences of allowing an incinerator to operate in Sowerby Bridge. Alternative waste management solutions, such as recycling and composting, should be explored to address our community's waste disposal needs in a more sustainable and environmentally friendly manner.

As elected representatives tasked with safeguarding the well-being of our community, I implore you to listen to the concerns of local residents and reject the proposal for the incinerator in Sowerby Bridge. Our health, environment, and quality of life are at stake, and it is imperative that we take decisive action to protect them.

Thank you for your attention to this matter.

XXXXX

763 To Whom It May concern:

I wish to object to the application for an Environmental Permit for a Small Waste Incineration Plant at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge, West Yorkshire, HX6 3LL.

I am the partner of XXXXX, who was brought up in Sowerby Bridge. Her parents live up the road from the proposed incineration site at the valley bottom, and we often stay with them. I would like it noted that I agree with the objections stated in the email from XXXXX, and of their neighbour XXXXX (both at XXXXX). I have long been following the campaign against the incinerator and for that reason, I attended the public meeting about the incineration application on Saturday 23rd March at Foundry Street Community Centre in Sowerby Bridge, which although called at short notice, was extremely well attended - there is clearly huge opposition to this going ahead from local residents for the following reasons, which are outlined in much greater detail on the emails you will have received from XXXXX, amongst many others:

- Noise
- Flooding risk which would result in pollution to the river Calder
- Woodland damage to the trees due to the stack height of the chimney
- Air Pollution and consequent negative impact on health of residents
- Increased traffic and congestion to an already busy Sowerby Bridge
- Competence of Applicants / Process
- Data Modelling not being relevant for the proposed site; location being unsuitable due to being in a valley bottom

The straightforward solution would be for CMBC to refuse this application or admit they cannot act independently and make no decision on it. Either decision would allow the applicant the opportunity to take the matter back to the Secretary of State.

Regards

XXXXX

764 Calder Valley Skip Hire SWIP application - Objection.  
Ref S13/006

Issues of concern

It is inappropriate location for the incineration of waste.

The location is a highly populated steep sided valley and polluted air from the incineration process will damage air quality.

This will be a significant health-hazard to many hundreds of people far into the future.

The modelling for assessing the potential dangers was not calculated rigorously enough for the potential risk.

The report sites Leeds airport as the model for making calculations. It would be hard to think of a more different location to base any credible conclusions.

The risk to human health has not been adequately determined.

It is a reckless plan that will seriously damage human health in the area.

Health to the flora and fauna in the area is even less well studied and accounted for.

Should the incinerator be allowed to be operated, there is no local confidence in CMBC having sufficient resources to ensure enforcement to keep the operation on or below the estimated harmful levels of pollution.

THE PERMIT SHOULD BE REFUSED

XXXXX

765 I strongly object to this application which is clearly against the best interests of residents and the local habitat.

Sowerby Bridge already suffers from pollution due to the heavy traffic flowing through the town and is in an Air Quality Management Area, only 670 metres downwind of the incinerator.

Thanks

XXXXX



766 To whom it may concern,

I am writing to object to the application for an Environmental Permit for a Small Waste Incineration Plant at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge, West Yorkshire, HX6 3LL.

I grew up in Sowerby Bridge at XXXXX, which is approximately 200m from the proposed site of the small waste incineration plant (SWIP). I regularly return with my family to visit my parents. My father has written a detailed letter of objection and I would like to note that I agree with all of the reasons for objection listed in his email. These are as follows:

- Noise levels
- Flooding risk which would result in pollution to the river Calder
- Woodland damage to the trees due to the stack height of the chimney
- Air Pollution and consequent negative impact on health of residents
- Increased traffic and congestion to an already busy Sowerby Bridge
- Competence of Applicants / Process
- Data Modelling not being relevant for the proposed site; location being unsuitable due to being in a valley bottom

The straightforward solution would be for CMBC to refuse this application or admit they cannot act independently and make no decision on it. Either decision would allow the applicant the opportunity to take the matter back to the Secretary of State.

Regards

XXXXX

767 I would like to object to plans for a waste incinerator in the Ryburn Valley. It is in a wooded valley that is steep sided and susceptible to flooding. It is a residential area that is already prone to pollution and is totally unsuitable for a facility of this nature. I personally suffer from respiratory problems and feel that a facility of this sort would only add to my health issues. XXXXX.  
Sent from my iPhone

768 I'd like to object on grounds that my husband has serious lung problems and we live in the valley.  
Kind regards  
XXXXX  
Sent from my iPhone

769 Dear Calderdale,

I am writing to voice my strong opposition to the proposed incinerator in Sowerby Bridge. The previous application was denied for good reason: the proposed incinerator poses a serious threat to the health of local residents and the environment. Our elected representatives and MPs agree that clean air is essential for our community's well-being, and I urge you to consider their opposition. The proposed location of the construction, near numerous schools within one and two miles, is particularly concerning. Our children's health will be put at risk if this project goes ahead. The unique topography and wind patterns of the Ryburn Valley mean that polluting gases will blow towards the heart of our community. This is especially alarming given the high rate of respiratory tract infections in infants under one year in 2016 and asthma admissions in 2019. I have additional concerns about the proposal's reliance on weather data from Leeds Bradford Airport, which is not representative of our area. Furthermore, the company's past incidents, such as fires and flood risk, raise serious questions about their ability to operate the incinerator safely. Removing the Council's ability to monitor compliance by requesting site diaries and inspection records is equally troubling. I strongly urge you to reject this application. The potential risks to our air quality and health are simply too great to ignore.

Yours sincerely,  
XXXXX

770

Subject:  
Objection to the Proposed Incinerator at Rochdale Road, Sowerby Bridge

Hi,

I am writing to express my strong objection to the proposed construction of an incinerator at Rochdale Road, Sowerby Bridge, which is alarmingly close to our residential community. The decision to place such a facility within proximity to homes where families reside is not only inconsiderate but also poses significant health and environmental risks.

First and foremost, the emissions from incinerators are a major concern. They contain harmful pollutants such as dioxins, furans, mercury, and particulate matter, which can have detrimental effects on human health, particularly on the respiratory system.

The World Health Organization has classified some of these substances as carcinogenic, and their presence in our air could increase the risk of cancer and other serious illnesses among residents.

Furthermore, the environmental impact cannot be overlooked. Incinerators contribute to air, soil, and water pollution, and they undermine recycling efforts by burning materials that could otherwise be reused or recycled.

The long-term ecological damage that could result from the incinerator's operation is unacceptable. Additionally, the quality of life in our community is at stake.

The presence of an incinerator would likely lead to increased traffic from waste transport vehicles, noise pollution, and a decrease in property values.

These factors combined would erode the peaceful and safe atmosphere that our neighborhood has always cherished. In light of these concerns, I urge you to reconsider the placement of the incinerator. There are alternative waste management solutions that are more environmentally friendly and pose less risk to public health, such as recycling and composting programs, which I strongly advocate for.

I hope that you will take the voices of our community into account and make a decision that prioritizes the health and well-being of its residents. We are prepared to support this matter through all necessary means, including legal action if

required.

Thank you for your attention to this urgent matter. I look forward to your prompt response.

Sincerely,

XXXXX

Sent from my iPhone

771 From: XXXXX

Having lived in Sowerby Bridge for 52 years in a house 200m directly above the site of the proposed incinerator, I wish to register my objection to this application.

The site is totally unsuitable for an incinerator, being located at the bottom of a steep sided valley next to the river Ryburn. The river has flooded in the past and water has swept through the site carrying waste directly into the Ryburn and from there into the Calder, which must affect all fish living in these rivers.

But the effects on human health if this application was accepted would be very, very serious. Respiratory health in this area of Calderdale is already worse than the national average. Emission of pollutants from the stack would obviously only exacerbate the situation. There are several nursery, primary, and secondary schools in the area. The health of these children is paramount.

The stack does not even reach the tree line in this part of the valley. On calm days, mist or smoke can hang for hours in the valley, so pollutants issuing from the stack would also linger in the air.

Noise is another huge concern for residents living nearby as CVSH intend to work 24 hours a day, 5 days a week. Monitoring would need to be incredibly well controlled.

Traffic volume to the site would increase, also affecting local residents.

There will be many technical objections to this application, but my gut instinct just screams that it is a totally inappropriate place for an incinerator. Calderdale must refuse this application or admit they cannot act independently and therefore make no decision, in which case the matter should be taken back to the Secretary of State.

772 Dear Calderdale,

I am writing to express my strong opposition to the proposed incinerator in Sowerby Bridge. As a resident of this area, I am deeply concerned about the potential impact this incinerator could have on the health and safety of our community.

The previous application for the incinerator was denied due to concerns about the hazardous waste gases that could negatively affect the health of local residents and the environment. The proposed location of the chimney, near numerous schools and within one and two miles, poses a significant threat to the health of our children. The unique topography and wind patterns of the Ryburn Valley will cause polluting gases to blow towards the heart of the local population, which is particularly concerning given the high rate of respiratory tract infections in infants under one year in 2016 and asthma admissions in 2019.

Moreover, the proposal's reliance on weather data from Leeds Bradford Airport is not representative of the Ryburn Valley. Given the past incidents of CVSH, such as fires and flood risk, it is unclear if they can operate the incinerator safely. Additionally, the removal of the Council's ability to monitor compliance by requesting site diaries and inspection records is deeply troubling.

Therefore, I urge you to reject this application as it poses unacceptably high risks to our air quality and health. I hope that you will consider these concerns carefully and make the right decision for the safety and well-being of our community.

Yours Sincerely,  
XXXXX

773

Dear Calderdale,

I am writing to express my concerns about the proposed incinerator in Sowerby Bridge. I believe that the operation of this facility could harm our health and environment.

The Government Planning Inspector rejected the application in July 2023 due to concerns about the discharge of waste gases and their impact on the community. All elected representatives and MPs in the area have opposed this application, reflecting the strong opposition of the local people. Clean air is a fundamental right that should be safeguarded for our community, and it is worrisome that polluting gases from the chimney will not be dispersed above the level of the houses along the valley and hillsides but will instead be in the air breathed by all who live here.

In addition, there are 9 schools within 1 mile and 18 schools within 2 miles of the chimney. The schools in close proximity are all above the proposed chimney height. Moreover, a public footpath runs close to the site. Calderdale had the highest rate of respiratory tract infections in West Yorkshire for infants under one year in 2016 & asthma admissions in 2019.

The proposal relies on data from the weather station at Leeds Bradford Airport to demonstrate that the gases will be dispersed. However, this location is not in the Ryburn Valley, and the landform is entirely different. The steep-sided Ryburn valley and prevailing winds mean that emissions will frequently blow towards the centre of the local population. In windless conditions, local residents regularly see smoke and mist hanging for long periods in the valley.

There are reasonable doubts as to whether CVSH would operate an incinerator correctly. Already, there have been several fires, and there is also a flood risk. It is concerning that CVSH has shown the wrong postcode on the application for a place not at risk of flooding.

I urge you to reject this application. The risks to our air quality and health are simply too high, and we need to prioritize the safety of Residents and the local community.

Regards XXXXX

774 Dear Calderdale MBC Environmental Health,

I am writing to express my strong objection to Calder Valley Skip Hire's application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

Clearly you will have received many arguments against the plan but my main objection rests with the detrimental effect it will have on the health of the local population. I say this both as a doctor who lives in the area but also as the XXXXX, who's role is to support the wellbeing of the community.

Regards

XXXXX



775

Hi,

I am writing to express my strong objection to the proposed construction of an incinerator at Rochdale Road, Sowerby Bridge, which is alarmingly close to our residential community. The decision to place such a facility within proximity to homes where families reside is not only inconsiderate but also poses significant health and environmental risks.

First and foremost, the emissions from incinerators are a major concern. They contain harmful pollutants such as dioxins, furans, mercury, and particulate matter, which can have detrimental effects on human health, particularly on the respiratory system.

The World Health Organization has classified some of these substances as carcinogenic, and their presence in our air could increase the risk of cancer and other serious illnesses among residents.

Furthermore, the environmental impact cannot be overlooked. Incinerators contribute to air, soil, and water pollution, and they undermine recycling efforts by burning materials that could otherwise be reused or recycled.

The long-term ecological damage that could result from the incinerator's operation is unacceptable. Additionally, the quality of life in our community is at stake.

The presence of an incinerator would likely lead to increased traffic from waste transport vehicles, noise pollution, and a decrease in property values.

These factors combined would erode the peaceful and safe atmosphere that our neighborhood has always cherished. In light of these concerns, I urge you to reconsider the placement of the incinerator. There are alternative waste management solutions that are more environmentally friendly and pose less risk to public health, such as recycling and composting programs, which I strongly advocate for.

I hope that you will take the voices of our community into account and make a decision that prioritizes the health and well-being of its residents. We are prepared to support this matter through all necessary means, including legal action if required.

Thank you for your attention to this urgent matter. I look forward to your prompt response.

Sincerely,  
XXXXX

776

Dear Sir or Madam

I very strongly object to anyone in Calderdale Council (either officers or Council members) approving this Environmental Permit for the Sowerby Bridge incinerator, for the following reasons:

(1) First of all, I find that the Council members (our elected representatives) have now reneged on their duty of care to residents within our community by avoiding making any decision at Council member level - and delegating decisions to officers! This is entirely unacceptable! This was a statement made by Jenny Lynn:

Jenny Lynn, cabinet member for public services and communities, said: "We invite local people to share their views on the new Environmental Permit request from Calder Valley Skip Hire.

"The Council will consider the application at the end of the consultation period, taking all comments on board, with the support of an external specialist for an independent view."

When will there be allocated "an external specialist for an independent review"?

(2) In July last year, A Government Planning Inspector John Woolcock dismissed an appeal by Calder Valley Skip Hire. Mr Woolcock concluded he could not find that granting an environmental permit to operate the plant would NOT have an adverse effect on human health.

Why is Mr Woolcock's judgement now being disregarded by Calderdale Council? HOW CAN THIS BE ALLOWED WITHIN A DEMOCRATIC PROCESS?

Does Calderdale Council value their own judgement (in this case, now, it seems, ONLY the judgement of Council Officers) as being of greater importance than that of a Government Inspector? If so, why?

Mr Woodcock said that he was: "unable to find that waste gases from the incinerator would be discharged in a controlled way, as to safeguard human health and the environment".

(3) There are a number of documents which have been published. These have not yet been reviewed to ascertain why CVSH and their representatives believe this application will not have an unacceptable adverse effect on human health and the environment. Why have these not been reviewed?

(4) The HUMAN HEALTH RISK ASSESSMENT February 2022 Report Reference: C98-P09-R01 carried out by Gair

Consulting Ltd Independent Air Quality & Odour Specialists is only ONE assessment. There should now be an INDEPENDENT assessment carried out by a team of specialists/experts which has the agreement of all the objectors, since we need this assessment to be truly independent and impartial.

(5) The original application says that "Calderdale may request copies of the inspection records at any time". This has now been taken out of the 'new' application, which significantly removes the Council's ability to monitor compliance in the operation of the incinerator.

WHY IS THIS? Once again, I find that Calderdale Council is reneging on its duty of care to this community. This is an appalling situation, when a Council avoids taking responsibility for monitoring the health and safety of its residents by NOT checking regularly on compliance!

I hope that my above objections will be considered, as I am absolutely amazed that this Environmental Permit is even being considered, in view of the fact that Calderdale Council is fully aware that this environmental permit does NOT have the approval of the Government Inspector whose judgement was sought, so that this application could be finally determined and dismissed - for ever!

Does the owner of Calder Valley Skip Hire not understand the meaning of the word "NO"?

Kindest regards

XXXXX

778 To whom it may concern,

I am writing to express my strong objection to the proposed incinerator project in Sowerby Bridge, particularly in light of recent findings from the government inspector regarding its potential impact on air quality and public health. As a resident, living close to Sowerby Bridge and someone who spends a lot of my free time advocating for its local wildlife and conservation, I am deeply concerned about the detrimental effects this incinerator could have on our community's well-being and environment. The fact that Sowerby Bridge is already designated as an air quality management area underscores the urgency and importance of addressing any potential sources of pollution.

The proposed incinerator raises significant alarm bells, especially considering the remarks made by the government inspector regarding the inability to ensure that waste gases would be discharged in a controlled manner to safeguard human health and the environment. The statement from the government inspector, indicating an inability to guarantee the safe discharge of waste gases, is deeply troubling. It suggests a serious risk to the health and safety of residents, particularly vulnerable groups such as children, the elderly, and individuals with pre-existing health conditions. This is incredibly concerning to me, as I am sure it is to many other families in our community.

Moreover, the potential negative impacts of the incinerator extend beyond immediate health concerns. Air pollution can have far-reaching consequences, including environmental degradation, ecosystem disruption, and exacerbation of climate change. Given the pressing need to address these issues, approving a project with such uncertain and potentially harmful implications would be irresponsible and short-sighted. I urge you to consider the long-term well-being of Sowerby Bridge residents and the environment by rejecting the proposed incinerator project. Instead, I implore decision-makers to explore alternative waste management solutions that prioritise public health, environmental sustainability, and community resilience.

Thank you for taking the time to consider my objections. I hope that you will give careful consideration to the concerns raised by myself and other residents regarding the proposed incinerator.

Sincerely,

XXXXX

779

Dear Calderdale,

I'm writing to express my concern about the proposed incinerator in Sowerby Bridge. The Government Planning Inspector refused the application in July 2023 due to concerns about the discharge of waste gases and their potential risks to the health of local people and the environment. All elected representatives and MPs have opposed this application, reflecting strong local objections.

The incinerator's location is problematic as there are 9 schools within 1 mile and 18 schools within 2 miles of the chimney. This puts children and staff at risk of exposure to harmful pollutants emitted from the incinerator. Calderdale already had the highest rate of respiratory tract infections in West Yorkshire for infants under one year in 2016 and asthma admissions in 2019.

The Ryburn Valley's steep sides and prevailing winds mean that emissions will frequently blow towards the centre of the local population. In windless conditions, residents see smoke and mist hanging in the valley for long periods. Several fires have already occurred at the site, and there is a flood risk.

The application removes the Council's ability to request site diaries and inspection records to monitor compliance, leading to a lack of accountability that could result in potential violations of regulations and harm to the community.

Please prioritize our air quality and health by rejecting this proposal. I urge you to take action to protect the well-being of our community.

Thank you for your attention to this matter.

Sincerely,

XXXXX

780

I whole heartedly object to CVSH putting in this application again.  
Upon the grounds of it being rejected last time, and this was for glaringly obvious reasons.

An Incinerator in the middle of Sowerby Bridge, at the bottom of the valley would cause to much harm to the residents of this up and coming village.

We already have more patients per capita of respiratory disorders in Sowerby Bridge than the national average .

Calderdale council have a duty of care to its residents to stop this from happening ever!

CVSH based it's air clearing evidence based in Leeds, not in the bottom of a valley surrounded by trees, where the pollution will absolutely not clear well!  
Sowerby Bridge is already massively polluted from the sheer volume of traffic that passes through!

It is too close to primary schools, namely Triangle School and Ryburn Valley High School.

The chimney at CVSH falls short of reaching high enough for the pollution to "naturally clear" which isn't really possible as it goes somewhere .

The company are taking part in underhand tactics to let them be allowed to burn this waste which itself is immoral!

CVSH are a blot on the landscape of Sowerby Bridge, their trucks already regularly drive about without covers on which spills waste into the environment and is not cleaned up by them.

CVSH should have never been granted planning permission for this ! It screams of corruption within the council!

It is in the completely wrong location!!!

Please for the good of Sowerby Bridge refuse this Incinerator!!!

Yours faithfully

XXXXX



781 Good afternoon.

I would like to object to the application for the incinerator licence at sowerby bridge.

I have been a resident below Ryburn school for just over 51 years.

The Ryburn valley is very complex with steep sides. Smoke does not just go upwards and off it tends to sit in the valley bottom as demonstrated when Calder valley skip hire had a major fire quite a few years ago the smoke lingered for days and when it was on fire it kept setting off the fire alarm at my children's school in triangle so this demonstrates how the smoke travels down the valley rather than up and away.

I feel the following points should be taken into consideration.

- \* The competence of this company to run something like this they already don't stick to rules and regulations so this place would need constant unannounced monitoring.

- \* The substantial increase in heavy goods vehicles bringing waste to the site through sowerby bridge which already is very congested and has very poor air quality.

- \* The entrance to the site is poor and Lorries already cause a hazard by lining up near the entrance on double yellow lines.

- \* The materials they will be bringing ie animal waste ( the track record of the company through Queensbury/boothtown causing awful smells and it leaking all over the roads so basically if they are now to transport this to sowerby bridge they are basically polluting the majority of Calderdale.

- \* we can hear the working on the site during the day so we will be subjected to vehicles beeping when reversing 24/7 effecting our health due to lack of sleep and unable to have a windows open.

- \* The effect on human respiratory health we already have a major issue with lung and heart problems in humans from the effects of covid 19 and the nhs are currently opening respiratory clinics in all areas of the country to cope with the overwhelming problems people are having it does not make sense to add to this problem.

I live about XXXXX away from the site and are in a smokeless zone which I presume is set by the council so we cannot have say a log burner in our house but yet these could burn just what they want 24/7 on an industrial scale ? How does that work ?

- \* The effects on the local wildlife which is thriving with deer, bats, birds , badgers.

- \* The effect on the river which runs along side the site which is already a mess with the waste bricks etc they Chuck in there also the pollution from the site from water run off and the which will run for miles downstream to brighthouse and beyond eventually to the sea.

There are a million other reasons why this incinerator should not be allowed to operate in the proposed location but I hope that the points I have raised can be taken into consideration.

Thank you  
XXXXX

782

I wish to register my very strong objection to the application for an environmental permit for the waste incineration plant at Belmont Industrial Estate, Sowerby Bridge.

I have looked through the documentation submitted from the perspective of a reasonably scientifically literate person, with some experience of mathematical modelling. The vast majority of the supporting documents are written by commissioned experts in terms which would only be easily understood by other experts, containing arcane acronyms, units and terminology, and graphical representations which mostly serve to obscure rather than to inform. Nevertheless, there are some key points which are evident.

The mathematical model used to analyse the airflow, dispersion and level of pollutant concentration (described in Response to Air Quality Consultants Review of Air Quality Assessment (March 2022)) has two serious flaws:

- The use of 5 years of meteorological data from Leeds-Bradford Airport between 2013 and 2017 (para A29) is completely inappropriate on two counts.
  - The meteorological patterns from an area which is almost completely flat, bear no resemblance to the weather patterns seen in a steep sided valley, close to the conjunction of the Rivers Ryburn and Calder and two other steep sided valleys. Whilst the model attempts to allow for the effect of complex terrain on the concentration of pollutants (A36), it does not allow for the meteorological effects of that terrain. A recent attempt by a Sowerby Bridge resident to get appropriate weather data from the Met Office received this reply: 'That is a very narrow, deep valley (~500m wide) that simply will not be resolved by our analyses or NWP (Numerical Weather Prediction Model). We could not meaningfully assess conditions within that valley. Meteorological convention would suggest that valley would be prone to inversions/cold air pooling.' The final sentence here highlights a regular meteorological phenomenon that most local residents are familiar with – temperature inversions where we see cloud settling in the valley bottoms, inhibiting the dispersal of the plume.
  - The data is at best 7 years old, and the increasingly volatile nature of our weather due to climate change, has seen much more extreme weather patterns in the years since 2017, meaning the data used would be questionable for the area around Leeds-Bradford Airport, never mind the Ryburn Valley!

In RPS Memo Report (Air Quality Including Additional Sensitivity Tests), RPS describe additional tests (para2.2-2.5) using more recent NWP meteorological data 'for the site' for 2018-2022. This begs the question of the origin of this data (not stated), as the Met Office cannot 'meaningfully assess conditions within that valley.'

- It is the nature of mathematical modelling that whilst increasing the number of parameters may help to make the model more accurate, small changes in more than one parameter may cause large changes in overall outcomes. So for instance a significant change in the weather, combined with a higher than usual level of pollutant discharge, can create a much increased level of pollutants in the vicinity. The focus on 'calm conditions' in the sensitivity tests does not allow for

such exceptional conditions.

On a less technical note, there are obvious reasons why allowing an environmental permit would be wrong.

However good or otherwise the model might be that analyses the airflow and dispersion of the plume, it does not take into account the existing levels of pollution in Sowerby Bridge. Sowerby Bridge is in an Air Quality Management Zone, due to its existing levels of pollution, and anything which is likely to add to that existing pollution can only exacerbate the levels of pollution in the town. Accuweather's daily air quality report today says the air quality is 'Fair - The air quality is generally acceptable for most individuals. However, sensitive groups may experience minor to moderate symptoms from long-term exposure.'

The previous government inspector, who considered the proximity of the smoke stack to trees and woodland, said that he was 'unable to find that waste gases from the incinerator would be discharged in a controlled way, so as to safeguard human health and the environment.' Nothing significant has changed since then to make it any safer – the only real change is the commissioning of additional expensive analyses. There are five schools (four primary, one secondary) within 1 km of the CVSH site, and it is unthinkable that youngsters should be exposed to the health risks that seem inevitable. An increasing number of young people suffer from respiratory problem, caused by air pollution, and anything that risks making matters worse, however slight that risk claims to be, should be avoided at all costs.

Whilst the main focus is on the impact the emissions from the smoke stack will have on an already dangerously polluted environment, there are other environmental questions which have not been addressed adequately. These mainly relate to the transporting of waste to be incinerated, and the resulting pollution from additional traffic, and the related noise levels. Residents nearby have complained about existing noise levels from current operations, and the transporting and incinerating of 10000 tons of waste per year will add considerably to that noise – it is the cumulative effect of continually elevated noise levels which can be damaging to hearing, even at relatively low levels of 70-80 DB.

The additional number of vehicles transporting waste will also add considerably to the current high levels of traffic pollution, due to the heavily used and frequently congested A58 trunk road through Sowerby Bridge. Anything which causes additional traffic should be avoided, especially traffic of an HGV nature. When incidents close the M62, the A58 can be tailed back beyond Ripponden, and attempts have been made to reduce the flow of traffic through Sowerby Bridge, without much success – adding to it in this way is wholly inappropriate.

It is difficult to quantify the potential effect on the local flora and fauna, but there are plenty of popular footpaths in the locality, where people go walking in the woods to enjoy the natural world. Any deterioration in their condition due to the impact of pollutants on trees and other plant life, makes them less attractive to walkers. Indeed, if this were permitted, there would be a terrible irony in the fact that Active Calderdale is spending considerable amounts of money to encourage more people to walk in areas such as Dixon Scar Woods (within the 1 km boundary), whilst creating conditions that make outdoor walking and recreation less appealing!

One further environmental impact that has not been addressed anywhere in CVSH's submission is the issue of the smell from both the incinerator and transporting lorries. Residents in the vicinity of an existing incinerator at Swalesmoor regularly complain about the overwhelming stench from the incinerator, which they describe as unbearable at times – evidence of these complaints has been reported regularly in the Courier, and it is frequently raised in social media. That particular incinerator is on a hilltop, where emissions disperse more easily. How much worse will the smell be in a valley bottom?

In conclusion, there are a significant number of risk factors to the environment if this environmental permit were granted – air pollution, noise pollution, traffic pollution, smell. CVSH have recognised many of these in the reports they have produced, along with various strategies they suggest would mitigate these effects. A major worry is that many of the suggested strategies are qualified with the phrase 'where practicable.' Who is to decide what is practicable? It would be very easy for CVSH to decide that none of them are practicable, and that they will operate their plant with no concern whatsoever for the health and wellbeing of the people of Sowerby Bridge.

Please do the right thing and turn down this application for an environmental permit, for the sake of the people of Sowerby Bridge, who deserve to live in as pollution free circumstances as possible.

Best wishes

XXXXX

783

Dear Sir or Madam

I very strongly object to anyone in Calderdale Council (either officers or Council members) approving this Environmental Permit for the Sowerby Bridge incinerator, for the following reasons:

(1) First of all, I find that the Council members (our elected representatives) have now reneged on their duty of care to residents within our community by avoiding making any decision at Council member level - and delegating decisions to officers! This is entirely unacceptable! This was a statement made by Jenny Lynn:

Jenny Lynn, cabinet member for public services and communities, said: "We invite local people to share their views on the new Environmental Permit request from Calder Valley Skip Hire.

"The Council will consider the application at the end of the consultation period, taking all comments on board, with the support of an external specialist for an independent view."

When will there be allocated "an external specialist for an independent review"?

(2) In July last year, A Government Planning Inspector John Woolcock dismissed an appeal by Calder Valley Skip Hire. Mr Woolcock concluded he could not find that granting an environmental permit to operate the plant would NOT have an adverse effect on human health.

Why is Mr Woolcock's judgement now being disregarded by Calderdale Council? HOW CAN THIS BE ALLOWED WITHIN A DEMOCRATIC PROCESS?

Does Calderdale Council value their own judgement (in this case, now, it seems, ONLY the judgement of Council Officers) as being of greater importance than that of a Government Inspector? If so, why?

Mr Woodcock said that he was: "unable to find that waste gases from the incinerator would be discharged in a controlled way, as to safeguard human health and the environment".

(3) There are a number of documents which have been published. These have not yet been reviewed to ascertain why CVSH and their representatives believe this application will not have an unacceptable adverse effect on human health and the environment. Why have these not been reviewed?

(4) The HUMAN HEALTH RISK ASSESSMENT February 2022 Report Reference: C98-P09-R01 carried out by Gair

Consulting Ltd Independent Air Quality & Odour Specialists is only ONE assessment. There should now be an INDEPENDENT assessment carried out by a team of specialists/experts which has the agreement of all the objectors, since we need this assessment to be truly independent and impartial.

(5) The original application says that "Calderdale may request copies of the inspection records at any time". This has now been taken out of the 'new' application, which significantly removes the Council's ability to monitor compliance in the operation of the incinerator.

WHY IS THIS? Once again, I find that Calderdale Council is reneging on its duty of care to this community. This is an appalling situation, when a Council avoids taking responsibility for monitoring the health and safety of its residents by NOT checking regularly on compliance!

I hope that my above objections will be considered, as I am absolutely amazed that this Environmental Permit is even being considered, in view of the fact that Calderdale Council is fully aware that this environmental permit does NOT have the approval of the Government Inspector whose judgement was sought, so that this application could be finally determined and dismissed - for ever!

Does the owner of Calder Valley Skip Hire not understand the meaning of the word "NO"?

Kindest regards

XXXXX

To whom it may concern

I write to express my objection to the above Environmental Permit application from Calder Valley Skip Hire (CVSH) Ltd. I live 200 metres uphill from the site where Calderdale Valley Skip Hire have applied for the Environmental permit.

On 5th July 2023 a decision on the granting of an environmental permit ("EP") was made on appeal by Government Planning Inspector John Woolcock. CVSH choose not to exercise their right of judicial review instead preparing another application seeking the same permit and lodging it only 7 months after the appeal decision was made. The current application raises a number of legal issues including: 1) abuse of legal process. The resubmission of another application seeking the same permit a decision on which has already been made and not exercising the JR route 2) the principal of estoppel or res judicata. Arguably a final decision on the granting of an application has very recently been made and it is not in the interests of society to continue to bring this matter back repeatedly for determination 3) The Council are allowing the application to be determined by Council Officers who have previously indicated at appeal stage, contrary to Inspector John Woolcock they would allow the application. Any decision making by the Officers is arguably biased and it is not in the interests of justice that they make the decision on the current application. It also appears that throughout should have been a joint working approach between the council and Environment Agency in respect of the planning application (already granted but has been the subject of legal challenge) for the site and the environmental permit. This would have saved the time and expense of the application processing and litigation that has arisen and been threatened by CVSH's legal representatives should the environmental permit not be granted.

Further for reasons cited and set out below in respect of the intended operations of the site and the volume of of waste that will be processed, any decision (should there be legal grounds for this application to be considered) be made by the Environment Agency who would be the appropriate regulator. Decisions on the granting of this specific incinerator should not sit with the council. It is questionable whether the plant is technically a SWIP given its intended processing volumes. At section 6 of the application the rate of incineration is described as 2 kg/ h which is potentially a typo and should be clarified. The rate of incineration on the site plan in their application submission shows the transfer of 4.75 tonnes of residual waste per hour for 8 hours per day to the SWIP , incineration at these levels should require the application be considered by the Environmental Agency who are the appropriate Regulator.

The current application is littered with errors, inconstancies and poor scientific rational. The plant is in a high flood risk area, at a valley bottom with a small stack and using wind modeling data with entirely different topography and air



movement, Sowerby Bridge is unique in its topography and already suffers from air pollution and is in an Air Quality Management area. The MET office website shows there is a weather station at Copley, less than two miles away which one would consider more relevant metrological data than that used from the weather station at Leeds/ Bradford Airport for these purposes, raising questions of expert shopping to obtain a report that suits CVSH's purposes and therefore should not be relied upon. Nothing in this new application provides compelling evidence or rationale that the operation can be managed on an ongoing basis that will safeguard human health and the environment ( the rationale for John Woodcock's decision clearly still stands) and the application should not be allowed.

I request careful consideration of these points and those that will be raised by many others on this serious matter for Calderdale and the residents of Sowerby Bridge.

XXXXX

785	<p>I would like to voice my objection at the proposed site for an incinerator in Sowerby Bridge . As this proposal has been rejected once I hope that sense prevails and it is rejected again . The council should be standing up for the public who put them in positions of authority, in a world where we are trying to decrease emissions this incinerator would do just the opposite. Save our valley and protect our environment, keep our air pure .</p> <p>XXXXX</p>
786	<p>I strongly object to the proposed incinerator in Sowerby Bridge.</p> <p>We have sports grounds nearby including Sowerby Bridge CC , Triangle CC , Sowerby St Peters, Ryburn AFC &amp; Sowerby Bridge AFC.</p> <p>The players need to breathe in fresh air not polluted air, which would be the case if the permission was granted.</p> <p>XXXXX</p>

787 Subject: Objection to Schedule 13 Small Waste Incinerator plant. Ref: S13/006

XXXXX

Dear Sirs

Objection to Schedule 13 Small Waste Incinerator plant. Ref: S13/006

I write to object to above proposed application from Calder Valley Skip Hire for an environmental permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge. I am the resident/home owner of the above address which is 0.7 miles from the incinerator site.

I was born/grew up in Todmorden and following university lived in Manchester for over twenty years. I have recently moved to Triangle in August 2023 with my husband. On moving into the property, I was advised by my neighbour at no 2 Stile of the successful campaign the local community had ran to defeat the application for the permit for the incinerator in 2020. I attended the meeting on 23rd March 2024 at the Foundry Project. The meeting was well attended with many people standing due to seating being at capacity.

I object to the permit being granted for the following reasons:-

1. The application for the permit has already been considered once and was refused following inspection of the site by an independent planning inspector, John Woolcock. The applicant had opportunity to object to the decision and adduce their own evidence to rebut the decision of the planning inspector which they chose not to do. Considerable money has been spent from the taxpayer purse following the planning procedures. The issuing of a new application which bears no material difference to the first application which was rejected is an abuse of process and should not have been allowed. I work as a civil litigator and within the civil court system you cannot make the same application in the hope that a different judge will give you the answer you want. If this loophole exists in planning law, then the planning procedure and rules need to be overhauled and changed urgently. It is not equitably that a company with commercial interests and deep pockets can simply keep issuing applications until the council is worn down/or gives in because they do not have the funds to continue fighting.

2. The view at the back of our property has a view of the valley looking towards Sowerby Bridge and Ripponden. On early mornings mist hangs in the valley which burns out as the temperature increase throughout the day. My understanding of the environmental studies carried out in the area is that the smoke/pollution would drift down the valley, and on days of low air pressure this pollution would sit in the valley causing considerable harm to the wildlife, plants, fauna, and trees in the area. I understand the correct geographical term is 'inversion'. In the past month alone, I have seen several herons nesting and a family of deer in the woodland all from looking out of the windows from the rear of our property. The pollution from the incinerator would undoubtedly be harmful to wildlife. I attach a photograph of the view from the rear of our property on a misty morning. The thought of the mist being replaced with smoke, smog, pollution

from the incinerator is horrifying.

3. My husband and I moved from Manchester for a better quality of life and to escape the air pollution/toxic environment. The site chimney is not tall enough for smoke/fumes to clear the valley. My husband has asthma which is controlled by inhalers. He also suffers badly with hay fever. The pollution the incinerator will create will undoubtedly exacerbate these conditions. The report from the government inspector said that given the height and the proximity of the smoke stake to the trees and woodland he was 'unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment'

4. The application is being considered by two unelected planning officers. The council are refusing to vote on this issue. The issue of undue influence was raised at the meeting on the 23rd March. Concern was voiced that members of the council has been threatened with personal litigation on this issue. How can the public be reassured that the planning officers concerned with the case have not also been subject to threatening behaviour or influenced to decide in the applicant's favour?

5. My understanding is that if the permit application is granted this will not generate a substantial increase in employment or benefit the local community in any material way. The owners of the CVSH do not live in the area. Surely in considering the application the health and welfare of the many must outweigh the commercial interests of a small group of wealthy individuals?

6. The area is one of natural beauty which attracts considerable tourism. The Sowerby Bridge Master Plan says 'The master plan should be used to inform developers, planners, landowners and the public. It is intended to help ensure that interventions work together to achieve a coherent and liveable place for Sowerby Bridge residents to be proud of' The plan further lists its aims as ' A Sowerby Bridge that is: Healthy - walkable and bikeable, with clean fresh air to breathe Attractive - a desirable place to live, work and visit, with distinctive character Sustainable - protecting and improving our spaces, with the future in mind' The granting of the application for the incinerator is at odds with the aims and objections of this plan at so many levels.

This list is not exhaustive for the reasons of why I object to the granting of the permit being granted for the use of the incinerator, but voices some of the main concerns.

Please acknowledge receipt of my objections and keep me informed of any developments on this application.

Yours faithfully

XXXXXX

788

To whom it concerns,

I am writing to object to Calder Valley Skip Hires application for an Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

My objection is based upon a number of factors;

- John Woolcock stated that given the height and proximity of the smoke stack to trees and woodland, he was unable to find that waste gases from the incinerator would be discharged in a controlled manner as to safeguard human health and the environment – this application does not include a change to the stack height.

- The RUDP states developments which might cause air pollution will only be permitted if they would not harm the quality and enjoyment of the environment and that they should be located away from major concentrations of population. The proposed incinerator is very much in close proximity to major concentrations of population and I don't accept that adding any unnecessary pollutants to the air can be considered negligible and anything other than harming the quality of the environment.

- Sowerby Bridge is already suffering from pollution. It is in an Air Quality Management Area and is only 670 metres downwind of the incinerator. Smoke and mist regularly lie in the valley bottom and inversion can stop waste gases dispersing, this throws considerable doubt on the validity of the air quality models presented by CVSH.

- The original application says that, "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time", this has since been removed from the new application. This significantly removes the Council's ability to monitor compliance in the operation of the incinerator.

- The ADMS computer model that has been used, appears to have been developed using data from Leeds Bradford airport which is a totally different environment to that of the site in question. There doesn't appear to be substantial evidence that any adaptations to the model can be considered accurate. The flow of waste gases through the trees and valley cannot be accurately predicted by the computer simulation. When local terrain is considered unusual (such as being in the bottom of a narrow valley in the middle of a wooded area) this is undoubtedly going to impact what's considered "normal" dispersion.

- On a national level, there are enough incinerators to meet the Government Policy proposed for the amount of waste that we are able to incinerate in England, why are we allowing more to be built and used? This is counter-intuitive to the Government Policy. I do not consider increasing our capacity to incinerate waste an appropriate environmental strategy. We should be seeking/proposing objectives that are more environmental friendly and rather look to increase our recycling output and so reducing the amount of waste requiring incineration.

Local Councillors/MPs and from what I can see a large amount of the local community as whole have opposed this application and I hope you'll understand why. This is our home and this will impact the community we live in and the environment we're trying to protect.

Regards,  
XXXXX

789 I would like to strongly object to this application for an incinerator permit.

The site is unsuited for burning as it is on the valley bottom of a deep sided, tree lined, residential valley that already suffers high pollution from the emissions of through traffic and noise pollution from existing industry.

- the site is at risk from flooding

- insufficient site specific modelling has been done in this valley where temperature inversions are common and wind direction in the valley is complex to predict. The frequent inversions that occur in this valley will keep pollution in the valley and the flue is not high enough to achieve dilution, resulting in poor air quality and a significant threat to human health.

I also have strong doubts concerning the competence of CVSH to run an incinerator

THE PERMIT SHOULD BE REFUSED

XXXXX

790 Dear Sir/Madam,

I am writing to express my strong objection to the proposed incinerator in Sowerby Bridge.

The previous application was rejected in July 2023 due to concerns about the harmful effects of waste gases on the health of local residents and the environment. The proposed incinerator has faced unanimous opposition from all elected representatives and MPs, highlighting the community's commitment to maintaining clean air.

The proximity of the chimney to schools (within 1 mile and 2 miles) poses a significant risk to the health of children and adolescents. The unique topography of the Ryburn valley and prevailing wind patterns will result in polluting gases being directed towards the local population. This concern is exacerbated by the high rate of respiratory tract infections in infants under one year in 2016 and asthma admissions in 2019.

Furthermore, the proposal's reliance on weather data from Leeds Bradford Airport, which is not representative of the Ryburn Valley, raises questions about the accuracy of the dispersion claims. Additionally, CVSH's past incidents, such as fires and flood risk, cast doubt on their ability to operate the incinerator safely. The removal of the Council's authority to monitor compliance by requesting site diaries and inspection records is a significant cause for concern.

I urge you to reject this application to protect the health and well-being of our community and future generations.

Yours faithfully,

XXXXX



791 For the attention of the Community Safety and Environmental Permit team:

I am emailing to register my objection to Calder Valley SkipHire Ltd's application for an environmental permit for a new Small Waste Incineration Plant at their site in Sowerby Bridge. Ref: 240126 R JER1902 LD Calder Valley SWIP Application V1 R2.docx.

This application was previously rejected and there do not appear to be material changes in this application which would affect that original decision.

Aside from that, my concerns are on a number of fronts.

1. Local Inversion:

The proposed site is 670 metres upstream of an Air Quality Management Area. The modelling done by CVSH did not take account of localised conditions, in particular the issue of inversion in the valley:

Specifically around Inversions:

Surface inversions occur when a layer of cold air is trapped near the ground, acting as a lid that prevents vertical mixing. During inversions, pollutants emitted from incineration plants remain confined within the lower atmosphere.

The stable air prevents upward dispersion, leading to higher pollutant concentrations near the surface. Smog can form as trapped pollutants accumulate, especially in valleys and basins.

Cold-Air Pools (CAPs) are layers of cold air confined at the bottom of valleys or depressions during nocturnal hours.

Pollutants released by incinerators tend to accumulate within CAPs.

The negatively buoyant downslope flows transport and mix pollutants into the valley.

These flows trap air within the region of enhanced cooling, where pollutants remain concentrated. The depth of pollutant dispersion depends on temperature differences and wind speeds. These downslope winds bring air from above into the valley. Pollutants emitted near the valley floor are largely trapped within the region of enhanced cooling.

The implications for health risks are that proximity to incinerators specifically within valleys can expose residents to higher pollutant levels. CAPs also disrupt natural dispersion patterns, affecting local ecosystems.

This combination of inversion layers and cold-air pooling restricts pollutant dispersion, emphasising the need for more careful planning and greater caution when considering locating a waste incineration plant within the Sowerby Bridge valley.

Sources:

(1) Influence of Inversion Layers on the Distribution of Air Pollutants in ....  
<https://link.springer.com/article/10.1023/A:1026098305581>. (2) How Do Temperature Inversions Influence Air Pollution?.  
<https://sciencing.com/temperature-inversions-influence-air-pollution-10038430.html>. (3) Pollutant Dispersion in a  
Developing Valley Cold-Air Pool. <https://link.springer.com/article/10.1007/s10546-014-9984-5>. (4) Lesson3 TRANSPORT  
AND DISPERSION OF AIR POLLUTANTS - OCW.  
[https://ocw.ehu.eus/pluginfile.php/48615/mod\\_resource/content/1/03\\_Lecture\\_notes\\_Air\\_pollution\\_technologies\\_Lesson\\_03\\_OCW2016.pdf](https://ocw.ehu.eus/pluginfile.php/48615/mod_resource/content/1/03_Lecture_notes_Air_pollution_technologies_Lesson_03_OCW2016.pdf).

2: Emissions, Pollutants, and Health Concerns

It seems very unsuitable to introduce an incineration plant in close proximity to an area already struggling with air quality issues. The addition of this site is almost certain to exacerbate pollution levels, and specifically, pollutants which are particularly harmful both to humans and to tree health.

Harmful emissions from incinerators, including particulate matter, heavy metals, and dioxins, pose serious health risks to nearby residents, especially children attending the primary schools. The evidence around the health impacts of long term exposure to dioxins, particulates, heavy metals and other pollutants from incineration has shown serious impact on local populations, including respiratory issues, cardiovascular diseases, and even acute childhood leukemia. Given the proximity to schools, this risk becomes even more concerning.

Specifically:

Dioxins are highly toxic chemicals formed during the combustion of chlorine-containing organic substances (e.g., PVC) in incinerators. Dioxins continue to be considered a significant health concern due to their carcinogenic and endocrine-disrupting properties.

Heavy metals are released into the atmosphere from incineration. It releases ashes containing toxic metals such as lead, mercury, and cadmium.

Heavy metals are a major concern due to their persistence and potential harm to human health.

Incinerators also produce two forms of solid-residue Particulate Matter (PM): fly-ash (fine particulate matter) and bottom ash.

PM is associated with respiratory diseases and cardiovascular problems.

All the guidelines around the management of these serious health risks focus on reducing the production of these emissions, and siting any sources away from areas of risk to humans and the wider environment. When taken in conjunction with the pooling problem in Sowerby Bridge (see 1 above), this is a matter of very particular concern and unquantified risk to the Sowerby Bridge valley community.

Sources:

- (1) Dioxins and other harmful incinerator emissions. <https://ukwin.org.uk/resources/health/dioxins-and-other-harmful-incinerator-emissions/>.
- (2) The health impacts of waste incineration: a systematic review. <https://onlinelibrary.wiley.com/doi/pdf/10.1111/1753-6405.12939>.
- (3) Toxic Environmental Releases from Medical Waste Incineration: A Review .... <https://link.springer.com/article/10.1007/s10661-006-9503-3>.
- (4) Dioxins: health effects, incident management and toxicology. <https://www.gov.uk/government/publications/dioxins-properties-incident-management-and-toxicology>.

3. Impact on local schools and children:

The presence of this incinerator so close to primary schools raises valid concerns. Children are more vulnerable to air pollution due to their developing respiratory systems and increased outdoor activity.

The potential release of pollutants into the air could harm students' health, affect their concentration, and hinder their overall well-being. It is essential to prioritize the safety and health of young learners.

4. Woodland preservation:

This proposed site is in partial woodland, which has an ecological value of its own. Incineration plant requires significant space, infrastructure, and resulting habitat disruption, both from site development and resulting emissions from the plant. By using this location, we risk damaging valuable green space, disrupting local ecosystems, and reducing biodiversity. Preserving woodlands is crucial for maintaining our healthy environment and supporting wildlife in Sowerby Bridge and Calderdale as a whole.

5. Alternatives to incineration:

There are more sustainable alternatives to waste management. Instead of incineration, CVSH should be focused on maximizing re-use and recycling, and implementing better waste collection and separation in their waste management. Even landfill is a better option from an environmental impact perspective than incineration,

6. Overcapacity at existing UK Incinerators, and general recycling rates:

The UK already faces incineration overcapacity. Building new incinerators may not be necessary, especially as existing ones are underutilized. High rates of incineration correlate with lower recycling rates. Rather than burning potentially recyclable materials, we should prioritize recycling efforts to achieve the government's recycling targets.

7: Changes in weather patterns, increasing rain and runoff due to climate change

In just this last year, the water regulator reports that there has been a 54% increase in waste spillage to the rivers due to the overloading of surface waste water drainage systems across the UK. Given the climate changes that we are undergoing, we are certain to continue experiencing this kind of severe rain weather, which has significant implications for the management of ground-borne pollution from the site which do not appear to have been considered, or considered sufficiently.

In summary:

The proposed waste incineration plant's location near to schools, within woodland, and close to the SB Air Quality Management Area, greatly exacerbated by the well-known local air inversion issue which affects the valley, and by the increased rainfall expected in the coming years, all raise serious and significant environmental, health, and ecological concerns against this site, which the application has not addressed. This is the reason for so much anger and opposition amongst residents. I hope the local authority will consider these matters very carefully in making its determination here.

Thanks for your consideration,

XXXXX

792 Dear Sirs,

I am writing to strongly object to the application by Calder Valley Skip Hire, for an environmental permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

This application is a resubmission of an application dated 5th August 2020 which was refused at appeal on the 5th July 2023 by a Government Planning Inspector, John Woolcock.

The Government Inspector said that given the height and proximity of of the smoke stack to trees and woodland he was:

"unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment"

In addition, the ADMS computer model does not use local weather data. The flow of waste gases through the trees and valley cannot be accurately predicted by the computer simulation.

Sowerby Bridge is already suffering from pollution. It is in an Air Quality Management Area and is only 670 metres downwind of the proposed incinerator.

Smoke and mist regularly lie in the valley bottom and inversion can stop waste gases dispersing as shown by supporting photographs of the aftermath of fires in the valley. This throws considerable doubt on the validity of the air quality models presented by CVSH.

The original application says that "Calderdale may request copies of the inspection records at any time" but this has been taken out of the "new" application. This significantly removes the Council's ability to monitor compliance in the operation of the incinerator.

Considering the incinerator is forecast to burn 10,000 tons of waste a year and operate 24 hours a day from Monday to Friday, this would cause additional issues regarding increased traffic, road safety, and associated noise pollution, in what is already a congested area.

All local Councillors, of all political parties, and the two local MPs have opposed this application from the beginning. I strongly support the opposition, as there is no basis for passing this application from the previous submission which was rejected unanimously.

I believe breathing clean air should be a basic right of any community.

XXXXX

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XXXXX



794 Schedule 13 small waste incineration plant. Ref: S13/006

I strongly object to the proposed waste incinerator proposed in the ryburn valley.

People much more qualified than myself have reported that the valley sides are steep and it cannot be shown scientifically that ensuing particulate matter would safely disperse.

The site is at risk of flooding.

The meteorological department cannot support the claims against the risk or frequency of cloud inversion which I personally see over this valley.

The government planning inspector declined the proposal.

Our mp is fighting the proposal as are our local councillor and action group.

On a personal note I travel along the valley road many times a week and often there is an acrid smell, the source is unknown. If I can smell something it is because microscopic particles are entering my nose and if an incinerator was releasing harmful particulate matter that would hang around in the same way.

I have often witnessed cloud inversion in the valley, retaining any foreign airborne fumes like smog. I have also seen smoke from an accidental fire in the area of the skip hire compound hanging around at the treetop level after being doused by the emergency services.

The clean air act has worked miracles in Calderdale since my childhood and an incinerator in such a populated area would be a backward leap for respiratory disease.

Please protect our health and wellbeing for the future and uphold Calderdale as a forward thinking, green and healthy place to live

XXXXX

795 I wish to object to the proposed Sowerby Bridge incinerator on the basis of health grounds and visual impact. The proposed incinerator is located in the valley bottom with no clear evidence that the fumes/toxins/smells will displace so not to effect the residents of the valley and wider Sowerby Bridge community.

Please listen to the residents who oppose the incinerator and put the people of Sowerby Bridge before CVSH profits.

Kind regards

XXXXX

796

I thank Calderdale MBC for the opportunity to submit comments on this application. I am aware of some of the very technical reports that have been submitted by or on behalf of local people who do not support this application. I support that excellent and very thorough work. As a resident for over 50 years living 200 metres from the site I would add the following:

**NOISE** Existing background levels are shown in the application. Residents are currently checking these and would seek to agree them with CMBC as a condition if approval is to be considered. It is not clear as to whether the levels shown include the temporary night time noise created by a process at nearby Rosehill Polymers. A meeting has been held with this community orientated company who indicate that they are modifying equipment and will happily accompany residents at night with the relevant equipment to monitor sound levels. Background levels should therefore exclude this noise. The early morning and regular noise created by the on site road sweeper is very loud and penetrating. Do the recorded sound levels include this? If approval is being considered could there be a condition requiring a quieter process?

**FLOODING** Excellent technical information has been submitted by others and which I support. I would like to add to that by referring to past and recent history. The Ryburn Valley is steep sided with shallow soil overlaying sandstone rock as can be seen walking on the disused railway line. This is also confirmed on geological maps. As a result, rainfall floods rapidly downhill. The Ryburn is therefore a very volatile River – it also drains large reservoirs above Ripponden. In 1722 8 people drowned at Stirk Bridge just downstream from this site. In the 1980s a summer storm washed Watson Mill Lane away to a depth of 6 feet, and the local authority will be aware of the repairs that were required. The railway company who built the line alongside this site recognised this risk. The culvert which leads a watercourse from Norland Moor under the line towards the site where the original mill dam was sited is several times the cross-sectional area of the pipe now laid across the site to lead the water to the Ryburn. This pipe has a shallow gradient and consequently is unable to deal with flood flows. This is now catered for by an unauthorised breach in the mound separating the site from the river. River flows are further compromised by the weir which was installed to feed the original dam for Old House water powered mill on this site. The Victorian railway engineers further recognised the risk of flooding on this site. The access track on the downstream side of the site from Rochdale Road is bridged over the river. To prevent flooding should this bridge become obstructed or unable to deal with flood flows, a second tunnel was formed on the Rochdale Road side of the main tunnel. This tunnel still exists but needs clearing. Clearly there is historic evidence of the severe flood risk on this site, and it would only take one incident to have very serious consequences regarding the proposed waste incineration plant and the pollutants contained therein. The plant is sited on the lowest part of the site within feet of the River and when visited during the planning enquiry site inspection had regular 100mm diameter drainage holes at the base of the wall containing the plant. Any pollutants entering the Ryburn will quickly find their way to the Calder. The Calder at this location has a white-water canoe course – one of the few examples in England of such a sporting venture

funded by the community in a Town Centre. Every attempt should be made to keep this area as free of pollutants as possible. At the very least, if approval is being considered, competent and qualified engineers should undertake a site-specific flood risk assessment.

WOODLAND I have commissioned a qualified arboriculturist to provide an assessment which is attached. He has also advised me that a more detailed tree survey would be of further assistance to the eventual decision makers together with a report by an independent and qualified ecologist. This could be carried out subject to the approval of the relevant landowners to avoid any risk of unauthorised access.

AIR POLLUTION It is noted that the local air monitoring does not appear to include 2.5mg particle records. In the relatively junior science of the medical effects of this pollutant, it is becoming clear that more is being recognised about the severe effect this can have on the health very young and even unborn children. An early supporter of the work of the XXXXX- a qualified paediatrician - has now moved away from the area. He was most concerned about this matter as is anyone who has lost a child to cancer.

COMPETENCE It is noted that this matter is referred to in several comments made including that from the MP Holly Lynch and local councillors. As they say, competence should not need to be proven by convictions for regulatory offences. It can, for example, be demonstrated by examples of apparent reluctance to comply with conditions set by regulatory authorities. It is appreciated that those regulatory authorities such as the Environment Agency, Calderdale MBC Planning Services and Calderdale Environmental Services have, in the current climate, limited resources to assess and monitor this kind of installation and this has been explained in a helpful note from XXXXX. However, the applicant must be aware that any proposals for such a controversial activity needs a good public relations department such has been exemplified by the visits that local residents have made to the highly professional installation at Fartown in Huddersfield. Examples of reluctance to comply are numerous and include failure to satisfy planning and other conditions such as the gradient at the junction to the Rochdale Road, the siting of buildings in different position to that approved, the breach in the mound separating the site from the River Ryburn, the repositioning of the vehicle weighbridge closer to the public footpath, the absence of a woodland management plan, damage to protected trees in the area upstream of the main building, clear marking and protection of the public footpath across the site. The failure to follow government advice to run planning applications in parallel with the permitting process is also leading to difficult issues for the CMBC Environmental Services to resolve. Much evidence has been provided by others in the residents group about the conflict between planning requirements and the information now submitted in support of the permit – how can the SWIP operate if its hours are limited to when the drying plant is operational only during the day? What will be the burn rate – 1 ton per hour as shown on the Inciner8 leaflet and in compliance with the R1 calculation required by planning approval or some other figure? Both these requirements lead to much lower throughput than referred to elsewhere and which may make the plant less than viable. They will also be difficult to monitor. The EP application form

distributed to the public shows that the rate of burn will be 2kg per hour in para 6.1 – probably a mistake but this is a reflection both on the competence of the applicant who put their name to it and the local authority officers who accepted the application and distributed it to the public for consultation. That mistake alone could justify starting the EP application process again and if so, not including Statutory Holidays within the consultation period. Currently it appears, according to a note from a senior CMBC planning officer, that the conditions attached to the planning approval varying the original planning approval to allow burning on site were not satisfied within the required period. That approval may need re-visiting as it may no longer be valid.

PROCESS It has been mentioned by some residents that the sidestepping of the decision by an Inspector appointed by the Secretary of State and the decision of elected Councillors to rely on the decision of the employed officers working with a regularly employed outside consultant is an abuse of process. Facts that support this view are

1. The Chief Legal officer and Chief Environment Officer supported the CMBC barrister at the EP appeal. It was clear at this appeal, as can be seen from documents, that the Council officers supported the granting of the permit. The only case against approving the permit was presented by residents and some elected councillors who were not members of the Cabinet.
2. Documents have been seen which show that the applicant's legal team threatened individual councillors with legal costs.
3. After the appeal was turned down by Inspector Woolcock, a meeting was held between three residents and the Head of Environmental services in an attempt to achieve a good working relationship between officers and the public they work for. At that meeting it was indicated that if a new permit application was submitted, they would be likely to approve it.
4. Calderdale MBC employs the company to provide waste services for them.
5. One local Councillor, who is a member of the Cabinet and supports the residents' case, has been prevented from voting on the matter. At the very least there appears to be the risk of unconscious bias affecting a decision and residents may seek legal advice. The straightforward solution would be for CMBC to refuse this application or admit they cannot act independently and make no decision on it. Either decision would allow the applicant the opportunity to take the matter back for consideration by the Secretary of State.

Dear XXXXX,

I am writing to you following your recent instruction to provide my thoughts on the potential impacts, upon the adjacent trees and woodland, of a proposed development at Calder Valley Skip Hire, Belmont Industrial Estate, Rochdale Road, Triangle, West Yorkshire. I will also briefly review the arboricultural information which was submitted with the original planning application (Ref: 17/00113/WAM), whilst drawing upon my own observations gained during a walkover survey

of the site, which was carried out from public access land. Local Designations and Habitats The Belmont Industrial Estate is located approximately 900 m north-west of Rough Hey Wood, which encompasses 13.1 hectares of ancient and semi-natural, and ancient replanted woodland. Figure 1: Plan showing the location of the Belmont Industrial Estate (outlined in red), in relation to ancient woodland sites (shaded in orange), and the Calderdale Council Wildlife Habitat Network (dotted areas)<sup>1</sup>. Ancient woodlands like Rough Hey Wood are unique, because they have grown and adapted in harmony with native wildlife over many centuries; they provide a range of habitats, which support a 1 Calderdale Council (2024) Calderdale Maps: Biodiversity and Geodiversity. [online]. Available at: ><https://new.calderdale.gov.uk/maps/biodiversity-and-geodiversity>< [accessed 28th March 2024] Rough Hey Wood North Dean Wood Long Wood/ Scar Wood 2 rich diversity of plants and animals. Many woodland species depend entirely for their survival on the continued existence of these ancient woodland habitats. Although the woodland surrounding the Belmont Industrial Estate is not designated ancient woodland, it forms part of the Calderdale Council Wildlife Habitat Network, and provides a link between Rough Hey Wood and three other ancient woodland sites to the east: North Dean Wood, Long Wood, and Scar Wood (Fig. 1). Green corridors that connect ancient woodland sites are vital - since ancient woodland covers less than 2.5% of the UK - and they help the associated wildlife to migrate between these increasingly rare habitats, allowing them to feed and breed. Industrial and commercial developments within wildlife habitat networks threaten to further fragment ancient woodland sites - at a time when reconnection is a priority - as climate change makes some places too hot, too dry, or too unpredictable for the associated wildlife to survive. The trees at the Belmont Industrial Estate site are also afforded statutory protection by three woodland tree preservation orders (TPOs): TPO Ref: 88/00349/C to the north-west, TPO Ref: 87/00307/C to the north-east, and TPO Ref: 86/00228/C to the south. The purpose of woodland TPOs is to safeguard areas of established woodland that have been identified as valuable, and which fundamentally depend on natural regeneration and/or new planting for their continued existence. All trees and saplings within the defined area of the woodland TPOs at the site are therefore afforded statutory protection, regardless of their size and/or age, including those planted or having seeded naturally since the order was made.

Assessing the Impact of Developments upon Trees Existing trees are a material consideration in the UK planning system. Where there is potential for existing trees to be impacted by development, an Arboricultural Impact Assessment (AIA) in accordance with BS 5837: 2012 – Trees in Relation to Design, Demolition and Construction: Recommendations (hereafter referred to as BS 5837: 2012) is usually required as part of the planning application. A Tree/Woodland Assessment Plan (Drawing Ref: 800, Rev: PO3) was submitted with the application, which divides the surrounding woodland into eight groups, and provides some basic information on the species, age, condition, and life expectancy of trees within each of these. Although the Tree/Woodland Assessment Plan does contain some information on the distance of the trees from the proposed chimney stack, and the height of the chimney stack in relation to the adjacent trees, the drawing does not sufficiently analyse the impacts of these upon the adjacent woodland. The Tree/Woodland

Assessment Plan therefore cannot be deemed to satisfy the requirements - as set out in BS 5837: 2012 - of an AIA. An AIA should therefore have been carried out in order to assess the direct and indirect impacts of the proposed development upon the adjacent woodland:

- Direct impacts would include any tree removals and pruning required to facilitate the proposed development, encroachment of permanent structures onto root protection areas (RPAs), and the digging of trenches/ stripping of topsoil within RPAs.
- Indirect impacts would include matters such as alterations to drainage patterns, shading, storage of construction equipment/materials, and soil contamination.

In this instance, the indirect impact of toxic gas emission is a concern, particularly when it is considered that the tops of many nearby trees are likely to be substantially higher than the proposed discharge height of the stack, and at a relatively close separation distance.

3 The Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories<sup>2</sup> states that the incineration of municipal waste can produce N<sub>2</sub>O (nitrous oxide) and NO<sub>x</sub> (oxides of nitrogen). The potential impacts of elevated atmospheric deposition of nitrogen on woodland ecosystems can include an increased sensitivity to natural stress, impacts on roots, reduced species diversity of the ground vegetation, reduced growth, and unbalanced nutritional status due to eutrophication and acidification<sup>3</sup>. I note that in your recent correspondence with the Met Office, a senior data scientist has stated that the topography of the Ryburn and Calder Valleys could mean that the local area is prone to inversions/cold air pooling. It is sensible to assume that during such conditions, deposition of nitrogen into the adjacent woodland is likely to be increased. It goes without saying that the emission of toxic gases from the proposed chimney stack at the Belmont Industrial Estate and the potential impacts of these upon the adjacent woodland should be further explored.

A Review of the Supporting Arboricultural Information to Application Ref: 17/00113/WAM Following my walkover survey - which was carried out from a public right of way to the south of the site - I can conclude that much of the information included within the Tree/Woodland Assessment Plan appears inaccurate, conflicting, or lacking in depth. For instance, G1 (Fig. 2) and G2 (Fig. 3) have been recorded to consist of goat willow (*Salix caprea*) and common ash (*Fraxinus excelsior*) monocultures, respectively. G1 and G2 were however found to contain far more diverse stands of young, semi-mature, and early-mature native species, including silver birch (*Betula pendula*), wild cherry (*Prunus avium*), elder (*Sambucus nigra*), and holly (*Ilex aquifolium*), in addition to naturalised species such as sycamore (*Acer pseudoplatanus*) and European beech (*Fagus sylvatica*). G1 and G2 are also noted to consist of trees with poor/fair condition, with “previous branch failures, broken branches in crown, moderate deadwood in the crown, and squirrel damage”. Such features are present to an extent; however, these are not only typical of the woodland setting, but they are also a vital structural element to a healthy and functioning woodland ecosystem.

2 XXXXX (Eds) (2000). Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories. Published for the IPPC by the Institute for Global Environmental Strategies, Japan

3 XXXXX(2000). ‘Nitrogen deposition and effects on European forests’, *Environmental Reviews*, Vol. 8 (No. 2), Pg. 65-93.

Figure 2: G1 Figure 3: G2

4 It appears that the surveyor has used the features of individual specimens to inform the BS 5837: 2012 classification of G1 and G2, which have been



recorded as category C (low-quality). Woodland groups should however be assessed as a collective, rather than by individual specimens; for this reason, there is a strong argument that G1 and G2 should have instead been classified as BS 5837: 2012 category B (moderate-quality). A life expectancy of 10 + years has also been applied to G1 and G2. Considering that both of these groups display natural regeneration of broadleaved trees within the understorey, as well as established semi-mature and early-mature specimens, it seems rather unlikely that these would all suddenly perish within the next 10-20 years. Therefore, a minimum life expectancy of 20-40 years would be more applicable, which would elevate the BS 5837: 2012 classification of G1 and G2 to category B (moderate-quality). Rather confusingly, G6 (Fig. 4) is predominantly comprised of young and semi-mature European beech (*F. Sylvatica*), has no public access, and is noted to display similar features to G1 and G2, yet has been classified as BS 5837: 2012 category A (high-quality). The reason for the contrasting BS 5837: 2012 categorisations of G1 and G2, and G6 are not obvious, nor are they fully explained. In the Notes section of Tree/Woodland Assessment Plan, it is stated that the document was produced using aerial imagery and ground inspection to provide tree locations. The accuracy of these methods are unreliable, and the locations of the trees/groups in the Tree/Woodland Assessment Plan can therefore be only taken as indicative. BS 5837: 2012 states that tree location plans should be aided by an accurately measured topographical survey which shows all relevant features, including:

- spot levels at the base of trees and throughout the site at an interval appropriate to meet design requirements, recorded as a grid and interpolated as contours, ensuring that any abrupt changes, embankments, ditch inverts and retaining features are recorded.
- the position of all trees within the site with a stem diameter of 75 mm or more measured at 1.5 m above ground level (In the case of woodlands or substantial tree groups, only individual trees with stem diameters greater than 150 mm usually need be plotted).

Details of how tree crown spreads and heights were measured, and how the distance of the trees from the proposed chimney stack were calculated have also not been provided in the Tree/Woodland Assessment Plan. If these were determined using the indicative tree locations, it is likely that these figures are also substantially out.

Figure 4: G6

5 Conclusions The proposed development at the Belmont Industrial Estate has significant potential to damage protected trees, both directly and indirectly, and the impacts upon the adjacent woodland have not been assessed in adequate detail to satisfy the requirements of BS 5837: 2012. For these reasons, completion of an AIA should be considered a necessity. The accuracy of any AIA is also reliant upon a topographical survey of the site being provided to the assigned individual or organisation that carries out the work. The potential impacts of the development extend beyond immediate damage to the adjacent trees and woodland, but also to the wildlife which uses this section of the Calderdale Council Wildlife Habitat Network for commuting, foraging, and/or breeding purposes – including rare species associated with several nearby ancient woodland habitats. Finally, it is not clear if the Belmont Incinerator is intended to operate on a 24-hour basis, though if this is the case, then the indirect impacts of light and noise pollution upon wildlife would also need to be further investigated by a suitably qualified ecologist.

Yours sincerely,  
XXXXX



797 I wish to register my objection to the above application. This is on the grounds of all previous refusals to grant permission and on the basis that no amendments to this current application create any material or acceptable improvement in this current application.

Quite frankly it is ludicrous and a complete waste of both time and money that the public and the Borough should be repeatedly faced with this proposal/appeals. Analysis and consideration has been undertaken repeatedly. No means no and should not be open to reconsideration for at least 20 years from the last decision. Please get a grip.

Yours sincerely  
XXXXX

798

Dear Sirs

Objection to Schedule 13 Small Waste Incinerator plant. Ref: S13/006

I write to object to above proposed application from Calder Valley Skip Hire for an environmental permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge. I am the resident/home owner of the above address which is 0.7 miles from the incinerator site.

I attended the meeting on 23rd March 2024 at the Foundry Project. The meeting was well attended with many people standing due to seating being at capacity.

I object to the permit being granted for the following reasons:-

1. The application for the permit has already been considered once and was refused following inspection of the site by an independent planning inspector, John Woolcock. The applicant had opportunity to object to the decision and adduce their own evidence to rebut the decision of the planning inspector which they chose not to do. Considerable money has been spent from the taxpayer purse following the planning procedures. The issuing of a new application which bears no material difference to the first application which was rejected is an abuse of process and should not have been allowed. If this loophole exists in planning law, then the planning procedure and rules need to be overhauled and changed urgently. It is not equitable that a company with commercial interests and deep pockets can simply keep issuing applications until the council is worn down/or gives in because they do not have the funds to continue fighting.
2. The view at the back of our property has a view of the valley looking towards Sowerby Bridge and Ripponden. On early mornings mist hangs in the valley which burns out as the temperature increases throughout the day. My understanding of the environmental studies carried out in the area is that the smoke/pollution would drift down the valley, and on days of low air pressure this pollution would sit in the valley causing considerable harm to the wildlife, plants, fauna, and trees in the area. I understand the correct geographical term is 'inversion'. In the past month alone, I have seen several herons nesting and a family of deer in the woodland all from looking out of the windows from the rear of our property. The pollution from the incinerator would undoubtedly be harmful to wildlife. I attach a photograph of the view from the rear of our property on a misty morning. The thought of the mist being replaced with smoke, smog, pollution from the incinerator is horrifying.
3. My wife and I moved from Manchester for a better quality of life and to escape the air pollution/toxic environment. The site chimney is not tall enough for smoke/fumes to clear the valley. I suffer from asthma which is controlled by inhalers. I also suffer badly with hay fever. The pollution the incinerator will create will undoubtedly exacerbate these conditions. The report from the government inspector said that given the height and the proximity of the smoke stack to the trees and woodland he was 'unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment'
4. The application is being considered by two unelected planning officers. The council are refusing to vote on this issue.

The issue of undue influence was raised at the meeting on the 23rd March. Concern was voiced that members of the council has been threatened with personal litigation on this issue. How can the public be reassured that the planning officers concerned with the case have not also been subject to threatening behaviour or influenced to decide in the applicant's favour?

5. My understanding is that if the permit application is granted this will not generate a substantial increase in employment or benefit the local community in any material way. The owners of the CVSH do not live in the area. Surely in considering the application the health and welfare of the many must outweigh the commercial interests of a small group of wealthy individuals?

6. The area is one of natural beauty which attracts considerable tourism. The Sowerby Bridge Master Plan says 'The master plan should be used to inform developers, planners, landowners and the public. It is intended to help ensure that interventions work together to achieve a coherent and liveable place for Sowerby Bridge residents to be proud of' The plan further lists its aims as ' A Sowerby Bridge that is: Healthy - walkable and bikeable, with clean fresh air to breathe Attractive - a desirable place to live, work and visit, with distinctive character Sustainable - protecting and improving our spaces, with the future in mind' The granting of the application for the incinerator is at odds with the aims and objectives of this plan at so many levels.

Please acknowledge receipt of my objections and keep me informed of any developments on this application.

Yours faithfully

XXXXX

Hi,

I put in an objection when the first planning was submitted. Will this still be applicable, or do I need to resubmit my objection? My objection is below. I have lived in this beautiful valley for over 20 years and I strongly object to the proposed incinerator being built.

I object on the following grounds:

1.The Wrong Location: the incinerator being located at the bottom of a valley. It is notable that under certain weather conditions unique to valleys toxic substances can be trapped by the phenomenon called temperature inversions.

2. Fears over risks to health of every living thing in the valley. Incinerators presently contravene basic human rights as stated by the United Nations Commission on Human Rights, in particular the Right to Life under the European Human Rights Convention, but also the Stockholm Convention and the Environmental Protection Act of 1990. The foetus, infant and child are most at risk from incinerator emissions: their rights are therefore being ignored and violated. Industrial emissions, stay fairly constant throughout the year, no matter what the season, on top of this cold temperatures and stagnant air have a way of creating a build-up of these substances near the ground, particularly during a weather phenomenon called temperature inversions. Valleys also have unique weather because their sloping sides can trap hot air, causing the area to warm up considerably in the summer. In other seasons or weather conditions, warm air sits near the ground and the air can rise easily and carry away pollutants. In a temperature inversion, cold air is trapped near the ground by a layer of warm air. The warm air acts like a lid, holding these substances down until they can grow to dangerous levels. We have no control of these temperature inversions they are a natural occurrence, but we can control what we release into the air. Many people would like to believe that waste disappears when it is burnt. In fact the burnt waste is transformed into ashes and gas. (A large incinerator for instance produces the equivalent of 300 wheelie bins of exhaust gases from its chimneys every second). As this happens, chemical reactions lead to the formation of hundreds of new compounds, some of which are extremely toxic. The number of substances released from a waste incinerator may run into thousands. So far, scientists have identified a few hundred substances as hazardous, just imagine the lid scenario happening in our beautiful Ryburn valley with all that toxic waste spewing out of the chimney that is proposed in Sowerby Bridge. In a House of Lords enquiry on 14th April 1999, Environment Minister Michael Meacher said, "Incinerator plants are the source of serious toxic pollutants: dioxins; furans; acid gases; particulates; heavy metals; and they all need to be treated very seriously. There must be absolute prioritisation given to human health requirements and protection of the environment. Some of the emissions are carcinogenic... Health Effects of Incinerators Numerous

studies confirm that a typical incinerator releases a cocktail of toxic chemicals, including dioxins, lead, cadmium, mercury and fine particles, into the atmosphere. However, there has been little follow up investigation into the effects of these poisons on people near incinerators. Greenpeace has compiled a comprehensive review of all the scientific studies carried out on people living near to or working in incinerators. The report Incineration and Human Health contains some worrying findings, for example: \* A study conducted on 70 municipal waste incinerators in the UK operating between 1974 and 1987, and 307 hospital waste incinerators from 1953 to 1980, identified a 2-fold increase in the cancer deaths in children living nearby. These results were consistent with a second study showing increased child cancers for hospital incinerators and large scale, high temperature combustion industries (study dates 1998 and 2000). ♦ \* In 1996, a study on residents living in an urban area near an incinerator in Italy found a 6.7-fold increase in deaths from lung cancer. ♦ \* A study in 1989 on people working at a Swedish incinerator between 1920 and 1985 found a 3.5-fold increase in deaths from lung cancer, and a 1.5-fold increase in deaths from cancer of the oesophagus. The same study also found an excess of ischemic heart disease, especially in workers with more than 40 years the list goes on... ♦ \* Buildings and Topography Buildings can cause the plume to come to ground much closer to the source than otherwise expected, causing higher pollutant concentrations. Plumes can also impact on hillsides under certain weather conditions or become trapped in a basin or hollow.' This statement holds special significance to members of the community. In addition to the incinerator being located in the bottom of a valley it is notable that under certain weather conditions all emissions would potentially be trapped in the valley. We already have to put up with high traffic emissions, when there are accidents on the motorway, traffic can back up through Ripponden and beyond. My concerned is with the inversion of weather conditions seen in valleys and incinerator added to the high volume of traffic, could see the residents of the Ryburn Valley experience increased concentrations of toxic pollutants, the knock on effect would mean more adults and children will be diagnosed with lung diseases, cancers, and heart disease to name a few.

Conclusion. Hopefully those people who will be making decisions that will affect everyone in the Ryburn valley and surrounding areas will have read all the proven and published official studies, not just in the UK but around the world and they will refuse planning permission.

Regards,

XXXXX

800

Dear Sir/Madam

I am writing to express my strong objection to the proposed incinerator in Sowerby Bridge.

The previous application was rejected in July 2023 due to concerns about the harmful effects of waste gases on the health of local residents and the environment.

The proximity of the chimney to schools (within 1 mile and 2 miles) poses a significant risk to the health of children and adolescents. The unique topography of the Ryburn valley and prevailing wind patterns will result in polluting gases being directed towards the local population. This concern is exacerbated by the high rate of respiratory tract infections in infants under one year in 2016 and asthma admissions in 2019. Furthermore, the proposal's reliance on weather data from Leeds Bradford Airport, which is not representative of the Ryburn Valley, raises questions about the accuracy of the dispersion claims.

The proposed incinerator has faced unanimous opposition from all elected representatives and MPs, highlighting the community's commitment to maintaining clean air.

Additionally, CVSH's past incidents, such as fires and flood risk, cast doubt on their ability to operate the incinerator safely. The removal of the Council's authority to monitor compliance by requesting site diaries and inspection records is a significant cause for concern. I urge you to reject this application to protect the health and well-being of our community.

Sincerely,

XXXXXX

801 I wish to strongly object to the application for an incinerator at Belmont in Sowerby Bridge. My allotment is approximately 300 yards away from where the incinerator would be and is not included in the receptor map in your studies. I would wish to object on a number of counts. 1. We have already had a thorough examination of this project by a government inspector who ruled against it. It is nonsense to simply label this decision as perverse and apply again and it should guide any further decision 2. Air quality. Even if, as is claimed, the exposure to persistent pollutants would only increase by 1.5%, this is in addition to existing sources, this is an increase, not a decrease in exposure. The dispersal estimation is clearly wrong. Residents know how long temperature inversions exist in the valley. This is supported by the meteorological society that, although they don't have data at a small enough scale, comment that the topology of the Ryburn valley but say it is just the situation where the claims for inversion occur. If the assumptions of exposure in CVSH models do not take this into account, then they cannot be accurate. No information is given as to how the estimated height of the emissions will reach given the flow will be cooled by ground mist and low cloud filling the valley. The base of the stack will only be 3 metres above the adjoining road.

Assumptions about the incinerator operation include the fact that there will be continuous combustion. The storage inside the building will not support 24 hours of operation and loading will be intermittent. Opening and closing loading will mean burners will be used more often than modelled. The modelling of gas flow given does not use the stack since it has not been built. If the speed is faster than estimated then unburnt material will be emitted.

The terrain model used does not show trees! The image of the building and stack is massively out of scale. and no scale is included in the diagram. 3.CVSH quote Calderdale conditions for such developments as not impacting local well being. Clearly the number of truck movements using this facility will increase. These trucks cause considerable damage to the road surface at the entrance. Trucks are often parked two at a time on the road waiting to get into the site. The 30 sign has been pushed into the hedge, showing how restricted turning is for the site. It is claimed the site is secure but there is a footpath across the middle of the site. There is no mention of what will happen in the soil drying area when the incinerator is not in operation at weekends. Drying soil will inevitably lead to the release of methane, which apart from the smell, is a fire hazard.

In short nothing in this application is relevant to the sp[ecifics of this site. That being the case, none of the modelling can be relied upon,  
XXXXX

802 Dear Sir/Madam

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Sincerely,

Kind regards  
XXXXX



803

To whom it may concern,

I am emailing to register my objection towards the application for environmental permit Ref: S13/006, Schedule 13 small waste incineration plant in Sowerby Bridge.

I was born and raised in Sowerby Bridge, and my parents still live in very close proximity to the proposed incinerator.

I strongly oppose the granting of an environmental permit for Calder Valley Skip Hire company.

My objections are numerous, and I have framed these around Calderdale Council's Climate Action Plan, which exists to lay out how the local authority are committing to improve the lives of the current and future residents of Calderdale.

Calderdale Council have set the target to achieve net zero by 2038. In the CC Climate Action Plan 2023-26, the council states as their vision "We want everyone who lives and works in Calderdale to live a happier, healthier and more sustainable life."

When located in the correct locations (not at the bottom of densely populated valleys), it is accepted that incinerators do currently have a small role to play in managing waste, but incineration is not the future, and is at odds with the national and regional roadmap to lowering emissions and creating a safer and healthier environment for citizens. Granting permission to incinerators is contradictory to 5 of the 6 key themes within the CC Climate action plan (I have not included "Warm and resilient buildings" as this is less relevant). Please find the CC statements below, with my comments following each.

"Influencing - Working together to influence decisions that will impact local climate action. We are all influencers and leaders who can inspire change."

Granting permission to the incinerator in the face of strong local opposition would damage the council's reputation and ability to influence on other important local issues. All local councillors from all political parties, and the two local MPs, have opposed this application from the start. Over the 8 years it has been continually fought and turned down, public trust in the council is being eroded. By rejecting the permit, Calderdale Council would be taking a stand for its residents and could start to build back that trust.

"Our themes: Community climate action - Lots of brilliant work is already being done to tackle climate change. Although, we must go further and faster to reach Net Zero. Joined up thinking and action at community level is a great first step." Community is at the heart of Sowerby Bridge, and there is a substantial local resistance to this incinerator which has been shown through protests, petitions, steering group action, and linking up with numerous local schools, groups, businesses and charities. The community could be putting their efforts towards taking positive action in tackling climate change in a range of initiatives, rather than fighting an ill-conceived and harmful incinerator.

"Our themes: Green economy - Tackling the climate emergency means new sectors, skills, jobs and technology. We need our businesses and residents to be future-ready so they can thrive in a Net Zero world."

The incineration of commercial and municipal waste does not positively contribute towards this theme. Residents and

businesses need to be encouraged and educated about reducing waste, which would therefore reduce the reliance on harmful incineration. Reducing waste, rather than focussing on recycling, is crucial in the journey to net zero.

“Our themes: Transport and getting around - The second biggest area of carbon emissions in Calderdale is travel. We must work together to make our transport systems work for everybody and our streets are safer, and greener.”

Granting permission to the Sowerby Bridge site would increase traffic to the town, as a result of multiple deliveries of waste per day/week (running 24 hours for 5 days per week). It is assumed that the vehicles would be large diesel lorries, which have a high carbon emission rate. This would not create safer or greener streets.

“Our themes: Land and nature - Calderdale’s distinctive countryside is something that can always lift our spirits. We need to protect and look after it so that it can store carbon and support our wildlife.”

The proposed site is at the bottom of the Calder Valley, which is a deep-sided, tree lined residential valley. In the planning appeal of 5th July 2023, Government Inspector John Woolcock stated that he was “unable to find that waste gases would be discharged in a controlled way as to safeguard human health and the environment.” After reviewing the thorough and detailed evidence, CVSH were not granted approval.

CVSH have not proved themselves to be responsible stewards of the environment, with multiple existing complaints about waste run-off going straight into the River Calder. In their latest application, CVSH have removed the detail that Calderdale would be able to request copies of the inspection records at any time. This significantly reduces the council’s ability to monitor compliance in the operation of the incinerator. Being adjacent to the river, the site is also at high risk of flooding. This poses further questions about the potential damage to the environment and wildlife through poor control of the waste plant.

CVSH modelled the dispersal of waste gases on a weather station at Leeds Bradford airport, which is a dramatically different landscape to the proposed incinerator site. Sowerby Bridge sits at the bottom of the valley and temperature inversions often occur, which trap low lying gases and pollution in the town. The existing model does not take this into account. Adding an incinerator into the mix would be detrimental to the air quality of the town.

I strongly oppose the granting of any permissions towards the incinerator in Sowerby Bridge, and hope I have demonstrated my reasoning. The council have a responsibility to the people who live in Calderdale to provide a safe and healthy environment, and in line with the United Nation’s Sustainable Development Goals, should take these responsibilities seriously. The most relevant SDGs are 3, 6, 9, 11, 12, 13, 14, 15, 17 <https://sdgs.un.org/goals>  
The proposed site for waste incineration is not conducive to safeguarding residents from risks to their health or protecting the environment.

Kind regards,

XXXXX

804	<p>Dear Sirs</p> <p>I write to object to the commissioning of an incinerator at Calder Valley Skip Hire.</p> <p>I run a business which operates at the bottom of the valley in Sowerby Bridge. I do not want my customers, whether holiday-makers or residents of boats, to breathe the fumes from the proposed incinerator. We also have staff who live near the skip-hire site.</p> <ol style="list-style-type: none"> <li>1. The Inspector has already rejected an essentially identical application, and the facts have not changed.</li> <li>2. The site, in the bottom of the Ryburn Valley, is subject to inversion fogs. The climate/weather evidence provided by the applicant relates to an entirely different place, the airport on a plateau at Yeadon; it should be considered irrelevant.</li> <li>3. Inversion fogs would prevent dispersion of the products of combustion away from houses and people in the bottom of the valley.</li> <li>4. There is no evidence that the trees would not obstruct dispersion.</li> </ol> <p>I strongly urge you to either reject the application now, or to delay consent until suitable weather information is provided from monitoring stations close to the site. These would need to show that inversions never occurred, which seems unlikely.</p> <p>Alternatively, if inversions are shown to occur as everyone knows, then there would need to be a system for immediately shutting down the incinerator during inversions. I doubt this is practicable.</p> <p>Best wishes,</p> <p>XXXXX</p>
805	<p>I strongly object to the proposed incinerator as it will warm the atmosphere and contribute towards global warming.</p> <p>XXXXX</p>

806

Dear Sirs

I am writing to express my strong opposition to the proposed incinerator in Sowerby Bridge. I believe that this project poses a significant threat to the health of our community and the environment, and I adamantly oppose it.

As you may know, the previous application for the incinerator was denied for valid reasons. It is absolutely crucial that we prioritize the health and well-being of our community in all decisions that we make, and I implore you to take this into account when considering this proposal.

One of my primary concerns is the proposed location of the incinerator, which is far too close to several schools. This is incredibly alarming, given the well-documented impact that air pollution can have on children's health. We cannot afford to expose our children to this level of risk.

Furthermore, the unique topography and wind patterns of the Ryburn Valley make it clear that polluting gases will blow towards the heart of our community. Given the high rates of respiratory tract infections and asthma admissions in recent years, this is simply unacceptable. The fact that the proposal relies on weather data from Leeds Bradford Airport, which is not representative of our area, is also deeply troubling.

In addition, I am troubled by the company's history of accidents, including fires and flood risks. These incidents raise serious questions about their ability to operate the incinerator safely. Removing the Council's ability to monitor compliance by requesting site diaries and inspection records is equally concerning.

In conclusion, I urge you to reject this application, unequivocally. The potential risks posed by this incinerator are far too great to ignore, and our community's health and well-being must be our top priority.

Thank you for your attention to this matter.

Yours faithfully  
XXXXX

807 Calder Valley Skip Hire SWIP application - Objection.  
Ref S13/006

Dear Sir or Madam

I wish to object to this application. I live in Norland and the emissions and micro particles will spread over this immediate area. There is often low cloud we can see from above in the valley which instead will be clouds of pollution.

CVSH have a shocking reputation and have no regard for the community.

The Council should not be leaving this decision up to planning officers who have no scientific background, relevant qualifications or experience.

This application should be turned down NOW, and permission to apply for further licences in future DENIED NOW.

The Council will have to live with this decision on its conscience if the health and welfare of the people of Sowerby Bridge and surrounding areas suffers as a result.

Waste should not be incinerated - it is going completely against the Climate Change objectives for the UK and net zero targets.

Big business should NEVER be more important than the health of residents and the natural environment and ecosystem of the Calder Valley.

How could anyone possibly consider putting the health of children and families at risk just because one business will not let this drop?

The Council should abide by the previous decision of the Government Planning Inspector of 5 July 2023 and the decision of the judicial review.

Please, for all our sakes and all our souls, do the right thing. The ethical thing. The responsible thing.

Issues of concern

1. Unknown impact on human health : harmful emissions

The modelling of air pollution does not satisfactorily represent the conditions in the valley even with rough surface calculations. The stack height is low, the point of emission is near level with the houses on Rochdale Road and the mixing of air / dilution of pollution at the point of emission is unknown. There is no absolute or definite information regarding dioxins or furan levels at the nearest receptors, we are provided with estimates and projections which are based on 1 particular model which does not allow for the topography, the woodland, the inversions in this valley.

Each report for air quality, uses terms like, estimates, projected, calculated based on a model of air distribution at Leeds airport. Some parameters have been set with the agreement of CVSH which is inappropriate. The valley suffers from inversions which will keep the pollution in the air that we breathe at low levels. The stack height should be much higher in this location.

Is it really acceptable to allow a risk to human health levels of dioxins and furans are predicted to be higher in the area and yet these are only estimates. On this basis alone the permit should be refused. The flue is not high enough to achieve dilution - the risk to human health has not been adequately determined and the effect on human health will be SIGNIFICANT.

## 2. Air quality

The addition of this significant amount of emissions to atmosphere will impact on air quality within the boundary. The data provided by the applicant shows much higher pollution levels at Spring hill mills area, this is due to prevailing wind conditions. Pollutants when they are able to disperse in the winter months will likely blow into the AQMA having a seriously detrimental impact on air quality within the AQMA and surrounding areas.

The original submission suggested that there won't be an increase in waste transfer in or out of site. This is incredulous. A business will operate to achieve maximum profit. It is profitable now bringing in waste sorting and moving waste to landfill. This operation will continue and the site will take in more waste to burn - numbers of vehicles to site will likely double if not triple. The effect on the AQMA will be SIGNIFICANT.

## 3. Noise

The plant is expected to run 24 hours a day. Waste is sorted and transferred across the site. The shutter door open for much of the time impacting on the ambient noise levels. No new noise data has been submitted since 2020. There are noise issues from the local mills already at night and this development will only contribute to that during the day but especially at night.

## 4. Flora and Fauna

Much has been made of the trees which incorrectly assumes that they will not prevent emissions diluting. Where is the report which looks at the impact of hot gases on these trees, how these harmful chemicals will affect the local ecology? Deer roam the woods, badgers, cuckoos, the woods are alive with birds and animals, how is nature to be protected. The flue is not high enough to allow gases to escape and the environment will be harmed.

## 5. Enforcement

CMBC have insufficient resources to ensure adequate enforcement a severe lack of specialists to deal with such a site, and there is also an apathy towards enforcement. The Authority has been threatened with litigation by CVSH, how so can they then take enforcement action against them now?

## 6. Probable amendment to hours of operation

As above the company will want to make profit, it is likely (more than likely) that they will want to extend operating hours which will further impact on the matters raised above.

**REFUSAL ON THE GROUNDS:**

Inadequate dispersal and dilution of chemicals which are harmful to human health.

\*The Stack height is inadequate

\*Dilution is negatively affected by the location of the of the plant in the valley bottom

\*Dispersal is negatively affected by the location of the emission point of the flue

\*Dispersal is negatively affected by the trees

\*Dispersal is negatively affected by inversions

\*Insufficient evidence is provided to PROVE that the incinerator will not be harmful to human health or the ecology.

**THE PERMIT SHOULD BE REFUSED**

Yours faithfully

XXXXX

808

Dear Sir.

As a local resident I wish to object in the strongest possible terms once again to Calder Valley Skip Hire's application to operate a waste incinerator on Rochdale Road, Sowerby Bridge.

- Firstly, Sowerby Bridge already suffers very poor air quality, indeed it is in an air quality management area such is the current pollution levels, therefore how on earth will operating a waste incineration site ½ mile up the road (and upwind) help in this case??
- Secondly, the height and proximity of the proposed smoke stack of the plant to the nearby trees & woodland mean that waste gases from the incinerator could not be discharged in a controlled manner which would safeguard human health & the environment.
- Thirdly, on a regular basis throughout the year mist & fog & smoke lie in the valley bottom throughout the year and inversion would surely stop waste gases from the incineration plant dispersing as is often seen after any fire in the valley. Such inversions are a common phenomena in our valley, so there must be better sights for a waste plant in other areas where such inversions don't occur.
- Lastly, Calder Valley Skip Hire needs to understand that this application has to be the last and that no further applications will be allowed.

Yours Faithfully,

XXXXX



809 To Whom It May Concern

I am writing to express my objection to the proposed incinerator in Sowerby Bridge.

The previous application was rejected in July 2023 due to concerns about the harmful effects of waste gases on the health of local residents and the environment.

The proximity of the chimney to schools poses a significant risk to the health of children and adolescents. The unique topography of the Ryburn valley and prevailing wind patterns will result in polluting gases being directed towards the local population. This concern is exacerbated by the high rate of respiratory tract infections in infants under one year in 2016 and asthma admissions in 2019. Furthermore, the proposal's reliance on weather data from Leeds Bradford Airport, which is not representative of the Ryburn Valley, raises questions about the accuracy of the dispersion claims.

The proposed incinerator has faced unanimous opposition from all elected representatives and MPs, highlighting the community's commitment to maintaining clean air.

Additionally, CVSH's past incidents, such as fires and flood risk, cast doubt on their ability to operate the incinerator safely. The removal of the Council's authority to monitor compliance by requesting site diaries and inspection records is a significant cause for concern. I urge you to reject this application to protect the health and well-being of our community.

Sincerely,  
XXXXX

Hi,

I am writing to express my strong objection to the proposed construction of an incinerator at Rochdale Road, Sowerby Bridge, which is alarmingly close to our residential community. The decision to place such a facility within proximity to homes where families reside is not only inconsiderate but also poses significant health and environmental risks.

First and foremost, the emissions from incinerators are a major concern. They contain harmful pollutants such as dioxins, furans, mercury, and particulate matter, which can have detrimental effects on human health, particularly on the respiratory system.

The World Health Organization has classified some of these substances as carcinogenic, and their presence in our air could increase the risk of cancer and other serious illnesses among residents.

Furthermore, the environmental impact cannot be overlooked. Incinerators contribute to air, soil, and water pollution, and they undermine recycling efforts by burning materials that could otherwise be reused or recycled.

The long-term ecological damage that could result from the incinerator's operation is unacceptable. Additionally, the quality of life in our community is at stake.

The presence of an incinerator would likely lead to increased traffic from waste transport vehicles, noise pollution, and a decrease in property values.

These factors combined would erode the peaceful and safe atmosphere that our neighborhood has always cherished. In light of these concerns, I urge you to reconsider the placement of the incinerator. There are alternative waste management solutions that are more environmentally friendly and pose less risk to public health, such as recycling and composting programs, which I strongly advocate for.

I hope that you will take the voices of our community into account and make a decision that prioritizes the health and well-being of its residents. We are prepared to support this matter through all necessary means, including legal action if

required.

Thank you for your attention to this urgent matter. I look forward to your prompt response.

Sincerely,  
XXXXX

811	<p>I wish to object the granting of an Environmental Permit for an incinerator at the Belmont site in Sowerby Bridge. There is an absence of meteorological data for the wooded site at the bottom of the deep sided Ryburn valley which is prone to temperature inversions.</p> <p>A 12 metre chimney stack height is wholly inadequate on a site at the bottom of 140 metre deep, highly populated valley. The site is prone to flooding and is unsuitable for waste handling operations.</p> <p>Noise and odour is inappropriate for a highly populated valley.</p> <p>Calder Valley Skip Hire and its holding company the Leo Group have shown they are unsuitable operators of an incinerator with breaches of operating hour restrictions, animal by product management infractions, health and safety breaches that have caused injury and death, a major fire on site and environmental pollution during flooding.</p> <p>XXXXX</p>
812	<p>To whom it may concern,</p> <p>I would like to object to the incinerator on the following grounds:</p> <ul style="list-style-type: none"> <li>- the site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution</li> <li>- the site is at risk from flooding</li> <li>- insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict</li> <li>- competence of CVSH to run an incinerator</li> </ul> <p>Yours sincerely,</p> <p>XXXXX</p> <p>Local resident</p>

813

Dear Calderdale council

I hope this finds you well.

I'd like to register my objections to this proposed facility again. My reasons are as follows:

The Valley this'll be in has a canal with a popular towpath that people use for exercise; running, cycling, wheeling, walking. In certain weather conditions there is a phenomenon called an inversion where air stays in a valley. Its visible when it's low cloud or fog. When out of breath & breathing deep, air makes its way into seldom used crevices of peoples lungs. When there's an inversion the air will have the particulates and fumes from the SWIP will remain in the valley and, because of the inversion any given day when it happens, will directly and adversely affect the health of people trying to improve or maintain their fitness.

Other issues I've become aware of:

- 1) Terrain. The local topography is such that predicting dispersion in the bottom of a narrow valley is extremely complicated and normal rules do not apply. The incinerator lies in the shadow of Norland Moor which is at 280m elevation causing a unique set of conditions. Dispersion is further complicated by the height of trees surrounding the site.
- 2) Reliance on computer modelling. The applicant has used evidence from two sets of computer modelling to support the application. One model shows the temperature distribution and residence time within the combustion chamber in order to show that a high enough temperature is reached for long enough to reduce dioxins, furans and particulates within the gas flow to acceptable levels for the emissions. Another computer modelling program is used to simulate the dispersion of those emissions. In both cases these models only show results for a prescribed set of input conditions. They do not represent what happens in the real world where conditions are variable and subject to abnormal or unforeseen events.
- 3) Weather Statistics. Weather data has been used for the dispersion modelling. The data used has come from Leeds Bradford Airport and Bingley. Leeds Bradford Airport is 20 miles away; it is England's highest airport at an elevation of 208m and has a totally open aspect in all directions. The site of the proposed incinerator is in the very bottom of a narrow valley with trees around. The weather patterns are not comparable. This renders the dispersion modelling analysis invalid.
- 4) Waste sorting. The combustion modelling is based on a typical RDF (Refuse Derived Fuel) waste composition. This

requires careful sorting and segregation which relies upon human intervention to obtain the correct mix. In a real-life situation the RDF will have variations making the combustion modelling invalid.

5) The Incinerator is not licensed to burn hazardous materials. However it is quite possible that hazardous materials could be missed in the sorting process leading to inadvertent incineration.

6) Lithium batteries are a known source of uncontrolled fire events in waste streams since lithium batteries are often present in domestic plastic waste. The risk assessment has not addressed the risk of lithium batteries in the waste incinerator.

7) Power failure. There is a risk of uncontrolled emissions during a power cut. In this situation the dispersion of the plume emitted from the stack will be outside the scope of the computer modelling causing pollution to the local area.

8) Incinerator Start-up and Shut-down. These are periods when emissions can exceed permitted levels giving pollution to receptors in the local area.

9) Human interventions. Safe operation of the incinerator plant will rely on human interventions. Highly trained and qualified staff will need to operate the plant. The training statement says that “any new operational staff are trained under the supervision of experienced operational staff”. This is unacceptable since standards of competence will be eroded over time leading to unsafe plant operation.

10. Dioxins are produced when burning RDF. Described by the WHO (World Health Organisation) “Dioxins are highly toxic and can cause reproductive and developmental problems, damage the immune system, interfere with hormones and cause cancer”. Dioxins are classified as Persistent Organic Pollutants. When considering potential receptors, the analysis should include Sowerby Bridge Day Nursery, Victoria Road, HX6 3AE which is close to the river Ryburn, downstream from CVSH.

Yours faithfully

XXXXX

814

§ Reference: S13/006.

§ Address: Belmont Industrial Estate, Rochdale Road, Sowerby Bridge.

My objection is

1. The Wrong Location: the incinerator being located at the bottom of a valley. It is notable that under certain weather conditions unique to valleys toxic substances can be trapped by the phenomenon called temperature inversions.

2. Fears over risks to health of every living thing in the valley.

Incinerators presently contravene basic human rights as stated by the United Nations Commission on Human Rights, in particular the Right to Life under the European Human Rights Convention, but also the Stockholm Convention and the Environmental Protection Act of 1990. The foetus, infant and child are most at risk from incinerator emissions: their rights are therefore being ignored and violated.

Industrial emissions, stay fairly constant throughout the year, no matter what the season, on top of this cold temperatures and stagnant air have a way of creating a build-up of these substances near the ground, particularly during a weather phenomenon called temperature inversions.

Valleys also have unique weather because their sloping sides can trap hot air, causing the area to warm up considerably in the summer.

In other seasons or weather conditions, warm air sits near the ground and the air can rise easily and carry away pollutants. In a temperature inversion, cold air is trapped near the ground by a layer of warm air. The warm air acts like a lid, holding these substances down until they can grow to dangerous levels.

We have no control of these temperature inversions they are a natural occurrence, but we can control what we release into the air.

Many people would like to believe that waste disappears when it is burnt. In fact the burnt waste is transformed into ashes and gas. (A large incinerator for instance produces the equivalent of 300 wheelie bins of exhaust gases from its chimneys every second). As this happens, chemical reactions lead to the formation of hundreds of new compounds, some of which are extremely toxic. The number of substances released from a waste incinerator may run into thousands. So far, scientists have identified a few hundred substances as hazardous, just imagine the lid scenario happening in our beautiful Ryburn valley with all that toxic waste spewing out of the chimney that is proposed in Sowerby

Bridge.

In a House of Lords enquiry on 14th April 1999, Environment Minister Michael Meacher said, "Incinerator plants are the source of serious toxic pollutants: dioxins; furans; acid gases; particulates; heavy metals; and they all need to be treated very seriously. There must be absolute prioritisation given to human health requirements and protection of the environment. Some of the emissions are carcinogenic..."

#### Health Effects of Incinerators

Numerous studies confirm that a typical incinerator releases a cocktail of toxic chemicals, including dioxins, lead, cadmium, mercury and fine particles, into the atmosphere. However, there has been little follow up investigation into the effects of these poisons on people near incinerators. Greenpeace has compiled a comprehensive review of all the scientific studies carried out on people living near to or working in incinerators. The report Incineration and Human Health contains some worrying findings, for example:

- \* A study conducted on 70 municipal waste incinerators in the UK operating between 1974 and 1987, and 307 hospital waste incinerators from 1953 to 1980, identified a 2-fold increase in the cancer deaths in children living nearby. These results were consistent with a second study showing increased child cancers for hospital incinerators and large scale, high temperature combustion industries (study dates 1998 and 2000). ♦
- \* In 1996, a study on residents living in an urban area near an incinerator in Italy found a 6.7-fold increase in deaths from lung cancer. ♦
- \* A study in 1989 on people working at a Swedish incinerator between 1920 and 1985 found a 3.5-fold increase in deaths from lung cancer, and a 1.5-fold increase in deaths from cancer of the oesophagus. The same study also found an excess of ischemic heart disease, especially in workers with more than 40 years the list goes on... ♦

#### \* Buildings and Topography

Buildings can cause the plume to come to ground much closer to the source than otherwise expected, causing higher pollutant concentrations. Plumes can also impact on hillsides under certain weather conditions or become trapped in a basin or hollow.'

This statement holds special significance to members of the community. In addition to the incinerator being located in the bottom of a valley it is notable that under certain weather conditions all emissions would potentially be trapped in the valley.

We already have to put up with high traffic emissions, when there are accidents on the motorway, traffic can back up through Ripponden and beyond. My concern is with the inversion of weather conditions seen in valleys and incinerator



added to the high volume of traffic, could see the residents of the Ryburn Valley experience increased concentrations of toxic pollutants, the knock on effect would mean more adults and children will be diagnosed with lung diseases, cancers, and heart disease.

Yours

XXXXX

815 Dear Sir/Madam

I am writing to express my strong objection to the proposed incinerator in Sowerby Bridge.

The previous application was rejected in July 2023 due to concerns about the harmful effects of waste gases on the health of local residents and the environment.

The proximity of the chimney to schools (within 1 mile and 2 miles) poses a risk to the health of children and adolescents. The unique topography of the Ryburn valley and prevailing wind patterns will result in polluting gases being directed towards the local population. This concern is exacerbated by the high rate of respiratory tract infections in infants under one year in 2016 and asthma admissions in 2019. Furthermore, the proposal's reliance on weather data from Leeds Bradford Airport, which is not representative of the Ryburn Valley, raises questions about the accuracy of the dispersion claims.

The proposed incinerator has faced unanimous opposition from all elected representatives and MPs, highlighting the community's commitment to maintaining clean air.

Additionally, CVSH's past incidents, such as fires and flood risk, cast doubt on their ability to operate the incinerator safely. The removal of the Council's authority to monitor compliance by requesting site diaries and inspection records is a significant cause for concern. I urge you to reject this application to protect the health and well-being of our community.

Sincerely

XXXXX

816 I am writing to express my opposition to the incinerator referenced in the subject heading of this email.

My opposition has been logged previously but I understand that the application has been raised again and that previous opposition to it cannot be taken into account.

My opposition is based on 4 concerns.

1. Safety, the valley that the incinerator is being built in is steep sided and populous. The area is prone to long periods of static air flow as proven by the many times I have witnessed cloud inversions that last for hours. Also as a resident of many years I have witnessed many bonfire nights where the smoke has lasted for many hours because of the still conditions. Placing an incinerator at the bottom of a valley such as ours risks the health of the population. Of particular concerns are the schools, care homes etc that are close to the proposed incinerator.
2. Pollution. I is highly likely that an incinerator would add to already problematic pollution issues faced due to our unique geology.
3. Traffic. This site will create many more heavy trucks on our already congested roads further adding to the congestion and pollution issues.
4. Economic impact. The area relies on its natural beauty to attract tourists, film crews and sustainable development. The incinerator project is likely to put this at risk for all the reasons listed above. Yet it will bring little economic advantage beyond a handful of jobs.

Our community is directly placed at risk by this development and only the owners stand to benefit.

For the benefit of current and future generations please deny this application. As you have in the past.

XXXXX

Thank you

817

Afternoon,

I am writing to strongly object to Calder Valley skip Hire's proposed Environmental Permit to operate a waste incinerator on Rochdale Road in Sowerby Bridge.

On the basis that the location of the proposed incinerator is not suitable.

John Woolcock (a government planning inspector), on his inspection of the site, given the height and proximity of the smoke stack to trees and woodland he was "unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment."

In addition, I am concerned about the impact the proposed incinerator would have to local residents. This is for the following reasons:-

As is widely known incinerators emit particles. The Committee on the Medical Effects of Air Pollutants (COMEAP) has published a series of statements and reports on the effects of air pollutants on health in the UK. It is accepted that exposure to current levels of common air pollutants damages health. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland seeks to reduce concentrations of air pollutants. Where concentrations of air pollutants are raised, Air Quality Management Areas are defined and plans to reduce concentrations are developed by Local Authorities.

Sowerby Bridge is already in an Air Quality Management Area and this is ~600 metres from the proposed incinerator. In addition to greenhouse gas emissions that exacerbate climate change, incinerators emit many toxins and pollutants that harm local air quality. Emissions include dioxins, NOx and ultrafine particulate matter that can be harmful to both human health and the natural environment. Incinerators emit large quantities of CO<sub>2</sub>, roughly one tonne of CO<sub>2</sub> for every tonne incinerated. About half of this CO<sub>2</sub> derives from fossil sources such as plastic. For decades incinerators have been releasing harmful greenhouse gas (GHG) emissions without compensating society for the associated harm that this has caused.

Both long-term exposure and short-term increases in exposure to particles can damage health. This is widely accepted (World Health Organization, 2006). Long term exposure affects the risk of mortality, especially from cardiovascular disease and from lung cancer (COMEAP, 2009, COMEAP, 2006; Health Effects Institute, 2000). Short-term increases in concentrations cause cardio- respiratory effects including an increase in deaths from heart attacks and from respiratory disease, increased hospital admissions for treatment of these disorders and increases in related symptoms. No thresholds of effect can be identified for either the effects of long-term exposure or for the effects of short-term increases in concentrations. Thus, any increase in particle concentrations should be assumed to be associated with some effect on health.

One of the most worrying aspects within the application submitted is Calder Valley Skip Hire have removed the council's

ability to monitor compliance in the operation of the incinerator.

As residents of Calderdale we believe that breathing clean air should be a basic right of any community.

XXXXX

818

To Community Safety, Environmental Health, Calderdale.

This is my objection to Calderdale planning S13/006 I have looked at this section of the Environmental Permit Application as it is a summary, and should accurately reflect the content of the rest of the Permit Application and associated documents. I have found shortcomings which should have been challenged before it proceeded further. I am not happy with the way that this application has been made to bypass the decision made by the Government Inspector last year. I hope that you will consider my comments alongside the many others, especially the fully researched technical objections, and refuse to grant the Environmental Permit. Flaws in the Non-Technical Summary of the Permit Application page

Paragraph 1. Calder Valley Skip Hire Ltd (CVSH) proposes to install a new small waste incineration plant (SWIP) at a site in Sowerby Bridge, West Yorkshire. The SWIP is already installed; Government advice is that the Planning and Permitting regimes should have run concurrently. The site map (Nov 16) is found at Waste Transfer Stations EMS (Appendix J) 4. Location of New Stronga Flowdrya. The postcode on this document is HX6 3BL and is the wrong postcode for the site, this postcode has a very low risk of surface water and river/sea flooding. The postcode HX6 3LL is the correct postcode and has a high risk of surface water flooding, and a medium risk of flooding from rivers. The building on this map shows some equipment already in situ. All equipment to be installed, and in situ on a temporary basis, should be shown on the site map. From information found in the Technical Documents (Appendix D), pieces of equipment measure 6.49m l x 6.49m w x 6.26m h and Skid dimensions: 555cm l x 227cm w x 252 h (Required area: 855cm l x 527 w cm x 402cm h.) Appendix D. All raw materials, waste and residues are stored within the thermal treatment building. RDF is stored within the RDF bunker. The dimensions of the RDF bunker are approximately 3.0m h, 6.7m w and 5.5m l. EMS Addendum for SWIP (version 2) Table 1 1.17 There is no accurate plan showing how these pieces of equipment will be situated in the building. As stated in paragraph 6 below, Skip vehicles will enter the building and the sealed containers and enclosed skips will be loaded onto such vehicles for transportation out of the site. Without an accurate plan there cannot be confidence that there is space for all of this equipment inside the building. I have estimated that the building is approximately 12.2m x 18.50m in area plus an area 6m x 6m to one side, if the other measurements on the site map mentioned above are accurate.

Paragraph 2. The SWIP will be regulated by the local authority (Calderdale Metropolitan Borough Council) under a Schedule 13 SWIP permit. The SWIP will process up to 2 tonnes per hour (tph) of refuse derived fuel (RDF) produced from the residual, non-recyclable fraction of the existing waste stream comprising primarily construction and demolition waste at the existing WTS located on the same site (EPR/SP3196ZQ). The maximum annual throughput will be 10,000 tonnes per annum (tpa) of RDF, all of which will come from the existing adjacent WTS activities. There is reference from CVSH to Inspector John Woolcock's Appeal Decision in the new Permit Application 1.5.4, and I will therefore quote from that document. Point 44. "Similarly, as the deemed refusal will stand it is not necessary for me to rule on the technical

objections raised by third parties. However, it is necessary to comment on the objectors' concern that CMBC has shown only limited understanding of the regulatory processes and that there is no evidence that CMBC has the technical expertise to regulate this facility. CMBC is the regulator for the proposed SWIP and has statutory responsibilities in this regard. Planning decisions should assume that the pollution control regime will operate effectively. It seems to me that the same assumption should apply to the monitoring and regulation of environmental permits. Local reservations about CMBC's ability to properly regulate the SWIP are no part of my decision to dismiss the appeal." I note that the 2019 Planning Appeal Decision by Inspector John Woolcock is included in the document list, but not the one by Inspector John Woolcock 2023. Technical documents Appendix D consists of leaflets describing the SWIP plant. The actual plant already installed is a mish mash of components, outlined more fully in objections by other members of the public. This is the contradictory information given on these leaflets. Appendix D document 1. The Inciner8 1000 medical is External Length (mm) 6.49m External Width (mm) External Height (mm) 6.26m with a burn Rate of 1000kg (1 ton) per hour. Appendix D document 2. The i8-1000 is the largest incinerator in our range, with a burn rate of >500kg (0.5tph). Not 1000-2000 tonnes tph as stated above. Appendix D document 3. The same document as document 2. Appendix D document 4. Dated 14/05/2015 There does not appear to be a specific OPSIS model specified. There is a report by Review and Assessment of Air Quality City and County of Swansea 5.5 OPSIS Hafod Differential Optical Absorption Spectroscopy (DOAS) – Real Time Benzene measurements, but this system is used in the field rather than in an emissions stack. Table 3-6. Appendix D document 5. BASIC Pollution Control. No technical information. Appendix D document 6. At the end of the Zuccatto leaflet: Please keep in mind that the skid requires at least 1.5 meters of free space on all sides for easy maintenance access. Required area: 855cm l x 527cm w x 402cm h.

Paragraph 3. Heat produced by the SWIP will be used within the drying plant to be installed as part of the WTS activities. This is not an appropriate use of generated heat because a) heat travelling through this pipe will dissipate into the soil surrounding the long underground pipe, b) the underground pipe will rapidly degrade releasing heat and gasses, and c) there very likely will not be a sufficient volume of materials to be dried resulting in heated, and possibly contaminated air being vented into the atmosphere. Its use is of concern as EMS Addendum for SWIP (version 2) states "The SWIP is only operated when the drying plant is also available for use in accordance with condition 6 of the planning permission." This Planning condition 6 says "Before the first operation of the SWIP hereby approved details of the Drying Plant and the connections to it from the SWIP shall be submitted to and approved in writing by the Local Planning Authority. The Drying Plant and the connections to it shall be completed in accordance with the approved details before the first operation of the SWIP and shall be maintained as installed. The SWIP shall not be operated in the event that the Drying Plant is not available for use." It being available for use is not the same as it being used and would suggest that heated air could be squandered, and the heat not fully recovered.

Paragraph 4. The SWIP will operate under the terms and conditions of a Schedule 13 permit which requires compliance

with the ELVs for pollutants specified by the IED for small waste incineration plant. I attended a meeting on 21st December 2023 with XXXXX, Principal Environmental Health Officer, XXXXX, Senior Environmental Health Officer and two other members of the public to discuss the fostering of positive relations between the public and CMBC. XXXXX and XXXXX both stated that if the emissions at the stack point monitor were ok there would be no reason to refuse an Environmental Permit. However, I do not agree that the emissions are the only relevant issue as the very many technical concerns, previously raised in objections, and currently raised by others, must be considered fully, and to this effect we left a list of concerns with the officers.

Paragraph 5. Effective pollutant abatement will be achieved through the injection of a hydrated lime sorbent to achieve acid gas neutralisation and activated carbon powder to abate dioxins, furans and mercury. A ceramic filter will facilitate removal of particulate bound heavy metals and other particulates. Selective non-catalytic reduction (SNCR) with urea will achieve a reduction in NOx emissions. Continuous monitoring of emissions to air will confirm that levels are within IED emission limits. Where continuous monitoring is not proposed periodic monitoring will be undertaken. If the emission levels are within safe emission limits, why has the following note been removed from the January 2024 application when it was on the previous Permit Application. 5.5.4 "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time." Open access to the records would give some reassurance to the public who are very skeptical about the monitoring of the site and I am very unhappy about this reduction in monitoring. Permit Application page 22. It is very concerning that in Table 3.6 Monitoring Frequency A1 Hydrogen fluoride (HF); Trace metals; Dioxins and furans, these dangerous particles are only to be monitored Bi-annually (periodic). They must be monitored more frequently.

Paragraph 6. All bottom ash and Air Pollution Control (APC) residue handling will take place within the thermal treatment building. Bottom ash will be manually raked by trained staff directly into containers which will be sealed prior to removal from the building. APC residues will also be handled within the building and will be loaded directly into enclosed skips. Skip vehicles will enter the building and the sealed containers and enclosed skips will be loaded onto such vehicles for transportation out of the site. 3.5.2 The SWIP will generate bottom ash. There is much concern that the volume of bottom ash will far exceed the estimations given by the company, and that the plans outlined in section 3.5 of the EMS Addendum for SWIP regarding the manual removal will not be possible. It is not explained how the bottom ash is separated from the APC residues. CMBC officers should have free access to records at any time. 3.5.5 Full containers will be loaded on to collection vehicles within the thermal treatment building prior to transfer offsite. 3.5.6 The enclosed skips are subsequently loaded directly onto collection vehicles within the thermal treatment building. It is not clear that there will be room to fit a collection vehicle loading a skip inside the thermal treatment building with the doors closed. Will the employees be equipped with suitable protective clothing?

Paragraph 7. The SWIP is intended specifically to recover energy, via combustion, from RDF. Energy will be recovered



from the hot combustion flue gas. Approximately 1.28 MWth of heat will be produced and approximately 180 – 200 kWe of electrical energy, part of which will be utilised on site and the balance to be exported to the Grid. The thermal energy will be transferred to the drying plant for use in the adjacent drying activities. I do not consider that the application for the permit includes sufficient description of the measures which are envisaged to guarantee that the plant is designed, equipped and will be maintained and operated in such a manner that the special provisions for waste incineration and plant are met taking into account the categories of waste to be incinerated.

Paragraph 8. The Operator has an existing Environmental Management System (EMS) to direct the operation of currently permitted process operations carried out on site under the waste permit. An addendum to the EMS has been produced to include management systems specific to the operation of the SWIP. In the EMS Addendum for SWIP, Table 1 SWIP Risk Assessment, there are 4 “fairly probable” categories which are of concern. 1.3. Incorrect transfer of RDF to the SWIP from the WTS. From the comments it sounds as though this would be very probable if the speed limit was over 5mph. 1.18. Pests and vermin. Only flies are mentioned specifically. Spraying insecticide within the building could have a detrimental effect for staff. 1.20. Noise from SWIP activities - a mitigation strategy to ensure that noise emissions are, so far as is practicable, reduced, suppressed and contained. This doesn't sound to be fully controlled. 1.22. Flooding. There has been surface water flooding at the site, grates have been blocked with mud, there is a high risk of surface water flooding as shown on the Environment Agency Flood Map. Summing up. The Calderdale Council barrister supported Calder Valley Skip Hire in the 2023 appeal; The Cabinet and the Council have been asked to make the final decision on this case and so far refused, despite strong, legal reasons being raised and, for some reason, choosing to delegate the decision to Officers. The decision making process has to be seen to be fair and impartial from the perspective of the general public. If Calderdale Council and their Officers are seen to have a predetermined position, they should not be involved in the decision. For so many good, sensible reasons there is overwhelming public opposition to this and the local community should not have this forced upon it. XXXXX

819

Sirs

I wish to object to the above application for a permit to operate an incinerator at Cvsh Belmont site in Sowerby Bridge for the following reasons

1/ There is no safe limits to micro particulates and dioxins produced by incineration. The devolved governments of the UK other than England have banned all further incineration applications on this basis.

The permit would allow 10,000 tons to be incinerated per year by the plant operating 24 hours per day, 6 days per week- the effect on local air pollution will be significant.

2/ There are 7 schools in the immediate vicinity of the Belmont site. These range from infant to 6th form. Any incinerator use would effect 2600 children who will be exposed to severe air pollution for the entire school year. This will put their health at serious risk.

3/ The Cvsh Belmont site is situated in a narrow steep sided valley which is subject to regular inversion of temperature events when air and air pollution is trapped in the valley making air pollution likely to increase significantly during these events- the last one was approximately 3 weeks ago.

4/ Traffic issues - the large amount of waste to be incinerated will result in a significant increase in Hgv traffic to the Belmont site over and above the current high rate of traffic to the site increasing both vehicle pollution and road safety. Queuing Hgvs on the main road is already causing traffic congestion which can only increase. The existing traffic turning into the Belmont site is damaging the road surface outside the entrance and this will only get worse, endangering all road users.

5/ Lack of Democratic decision making

The decision to grant the application will not be made by Calderdale elected councillors but by unelected council officers. Is this legal? Certainly this would make a mockery of local democracy if the application is approved.

6/ Oversight of Cvsh if incineration is permitted.

I understand that there will be minimal or no oversight as to what materials would be incinerated. Potentially Cvsh could burn whatever they wished so that air pollution would be much worse than Cvsh has proposed in their permit application.

7/ last year effectively the same application for a permit to operate was refused by a government inspector. Cvsh did not appeal.

So why a new application. No salient facts have changed.

I hope and expect for all the above reasons that the application be refused once and for all and that Cvsh be made to remove all the incineration equipment immediately. I suspect that this equipment is currently in use without a permit.

820

Hi

I object the the new incinerator for Sowerby Bridge, it not good yo have one in the valley

Regards.  
XXXXX

821

Hello,

Please take this email as a strong objection to the proposed incineration unit in Sowerby Bridge

Kind regards  
XXXXX

822 Dear Calderdale,

I have strong objections to the proposed incinerator in Sowerby Bridge. I believe that the health and safety of our community should be of utmost importance.

I find it worrying that the previous application for the incinerator was denied due to concerns about the hazardous impact of waste gases on the health of local residents and the environment. The proposed location of the site in a valley bottom, the chimney will exhaust well below local dwellings. There are numerous schools, within 1 mile and 2 miles. This poses a significant threat to the health of our children. The Ryburn Valley's unique topography and wind patterns will cause polluting gases to blow towards the heart of the local population, which is particularly concerning given the high rate of respiratory tract infections in infants under one year in 2016 and asthma admissions in 2019.

I find it odd that the proposal has reliance on weather data from Leeds Bradford Airport, which is not representative of the Ryburn Valley. Additionally, the past incidents of CVSH, such as fires and flood risk, raise questions about their ability to operate the incinerator safely. Lastly, the removal of the Council's ability to monitor compliance by requesting site diaries and inspection records is deeply troubling.

Therefore, I urge you to reject this application, as the potential risks to our air quality and health are unacceptably high. I hope that you will take these concerns seriously and make the right decision for the safety and well-being of our community.

Sincerely,

XXXXXX

823	<p>This proposed incinerator opposes Calderdale Councils plans for zero emissions 2038. The operation of such a waste incinerator poses serious risks to public health and safety. Incineration facilities release harmful pollutants into the air, including heavy metals, dioxins, and other carcinogens, which can have detrimental effects on respiratory health and overall well-being. Furthermore, the emissions from such facilities contribute to air pollution and climate change. Sowerby Bridge already has high pollution levels especially because of the effects of proximity to the motorway eg the frequent closures cause more traffic to flow through. The chimney stops considerably lower than the surrounding trees and hillside meaning the smoke would be trapped in the valley. And there are many houses and residents in the immediate areas. Schools too.</p> <p>The new application and resubmission of an application previously refused at appeal in 2023 is deeply concerning, particularly given the detrimental impact it could have on our community and environment.</p> <p>Furthermore, the omission of the right for Calderdale Council to inspect records in the new application severely hampers the council's ability to monitor compliance, thus further jeopardizing the safety of our community.</p> <p>XXXXX</p>
824	<p>I wish to object the granting of an Environmental Permit for an incinerator at the Belmont site in Sowerby Bridge. There is an absence of meteorological data for the wooded site at the bottom of the deep sided Ryburn valley which is prone to temperature inversions.</p> <p>A 12 metre chimney stack height is wholly inadequate on a site at the bottom of a 140 metre deep, highly populated valley.</p> <p>The site is prone to flooding &amp; is unsuitable for waste handling operations.</p> <p>Noise &amp; odour is inappropriate for a highly populated valley.</p> <p>Calder Valley Skip Hire &amp; its holding company, the Leo Group, have shown they are unsuitable operators of an incinerator with breaches of operating hours restrictions, animal by product management infractions, health and safety breaches that have caused injury &amp; death, a major fire on site &amp; environmental pollution during flooding.</p>

825 Dear Sir/Madam,

I am writing to express my strong objection to the environmental permit application submitted by Calder Valley Skip Hire for the operation of a waste incinerator on Rochdale Road in Sowerby Bridge.

As concerned resident, I believe that granting this permit would have several adverse effects on our community and environment.

Air Quality and Health Impact:

The proposed incinerator would burn up to 10,000 tonnes of waste annually.

Such intense burning can release harmful pollutants into the air, affecting the health of residents, especially vulnerable groups like children and the elderly.

Increased air pollution could exacerbate respiratory conditions and contribute to long-term health problems.

Traffic Congestion and Safety:

The transportation of waste to the site would lead to additional traffic congestion in the area. Large lorries carrying waste could further strain local roads and infrastructure.

Safety concerns arise from heavy vehicles navigating through residential streets, posing risks to pedestrians and other road users.

Environmental Impact:

The proposed site is close to schools, and increased air pollution could harm children's health and well-being.

The incinerator's emissions may also impact nearby Air Quality Management Areas, exacerbating existing pollution levels.

Flood Risk:

The site has recently experienced flooding, and any future development could result in waste entering the river<sup>1</sup>. This poses a threat to water quality and aquatic ecosystems.

Previous Refusals and Appeals:

Calderdale Council previously refused a similar plan in 2017, and the subsequent appeal was dismissed by the government in 2023<sup>1</sup>.

The decision to refuse planning permission was later overturned, but the environmental permit status remained undetermined due to legal challenges.

In light of these concerns, I urge the council to carefully consider the impact of granting an environmental permit for the proposed incinerator. Our community deserves clean air, safe roads, and protection from environmental hazards.

Thank you for your attention to this matter. I trust that you will make an informed decision that prioritizes the well-being of Sowerby Bridge residents and the environment.

826

Dear Community Safety,

I am writing to express my strong objection to the proposed use of the incinerator in Sowerby Bridge.

In July 2023, a Government Planning Inspector refused the application due to concerns about the discharge of waste gases and their risks to the health of local people and the environment. All elected representatives and MPs have opposed this application, reflecting the strong local objections.

Breathing clean air is a basic right that should be protected for our community. The proximity of the chimney to local schools, with 9 schools within 1 mile and 18 schools within 2 miles, is particularly concerning. The steep-sided Ryburn valley and prevailing winds mean that emissions will frequently blow towards the center of the local population. The proposal uses data from the weather station at Leeds Bradford Airport to show that the gases will be dispersed, which is nowhere near the Ryburn Valley and has a different landform. In windless conditions, local residents regularly see smoke and mist hanging for long periods in the valley.

There are also reasonable doubts as to whether CVSH would operate an incinerator correctly, with several fires already and a flood risk. It is concerning that the application removes the Council's ability to request site diaries and inspection records to monitor compliance.

Therefore, I urge you to refuse this application as the risks to our air quality and health are simply too high.

827

1st April 2024 view from XXXXX 7:30 pm rose hill polymers building to right of view calder valley skip hire central image  
XXXXX



828

Please accept this email as my objection to the environment permit application reference number S13/006

The basis of my objection is as follows:

1. I live on XXXXX. We have a XXXXX year old and our house sits on the hillside XXXXX the installed incinerator. At an altitude well over the top of the chimney. Whilst we are upwind of the stack in prevailing conditions, any general easterly wind will blow the plume directly at our property, this is of great concern to our future health and that of our young child and the other families living on our neighbouring streets, of which there are many.
2. There are 27 schools, primary and secondary, in close proximity of the site – we need to protect the health of local children. There is no indication through the environmental permit application how this would be reliably achieved
3. The Met Office have recently confirmed that they can not meaningfully assess conditions on the site where the environment permit is intended therefore I am not confident in Calder Valley Skip Hire's claim that the modelling done at Leeds and Bradford airport is a suitable reflection of any potential conditions specific to the weather system in this steep sided valley.
4. Sowerby Bridge is already an area suffering from pollution issues and is classified as an Air Quality Management Area. Calderdale was reported as having the highest rate of respiratory tract infections in West Yorkshire in infants under one years old in 2016.
5. The original application for this permit was refused following an appeal placed in July 2023 overseen by a Government Planning Inspector. This was due to concerns regarding the discharge of waste gases and the environment. It was demonstrated that this will not disperse above the level of the houses along the valley.
6. All elected representatives and MPs have opposed this application, which reflects the strong local objections to this application.
7. As custodians of the local populations wellbeing it is within the councils right to use discretion. So i call upon the council to act in best interests on this occasion and utilise your right to make decisions with discretion that reflects the circumstances and context of this application.
8. Calder Valley Skip Hire does not have a reliable record of managing a waste disposal site safely, with several fires on site and being placed in a potential flood zone. It is concerning that this current application has removed the right for the council to monitor diaries and inspection records. PLEASE NOTE CALDER VALLEY SKIP HIRE HAVE USED THE WRONG POSTCODE IN THEIR APPLICATION.

In addition to the points above please can tell me if the objections submitted to the council regarding this environmental permit application will be made public, and if the answer is no a reason for this.

XXXXX

829

Good morning,

I understand that there are many people who have already written in about this matter.

However, my opinion matters.

All of ours do.

And with the continued push to introduce the incinerator to Sowerby Bridge, despite being denied by a government inspector, and despite us as a community being vehemently opposed to this application for 8 years straight (8 years, how many times have they been shot down?), we are still fighting to stop this avaricious scheme being created next to our homes.

Please.

The incinerator plans from Calder Valley Skip Hire cannot go through.

We need clean air already in Sowerby Bridge, the pollution is already bad enough.

Now we have to write in (again) to stop our air stinking of garbage, the fumes having nowhere to go in the low valley but into the road, the woods, the Tesco's which is less than a mile downwind?

The fumes, the fire hazard of being in a valley woodland, the potential lawsuit against the council from our kids becoming sick from the air pollution, you have to do more than file these complaints.

Please.

Don't sell off our home.

830	<p>RE: Proposed incinerator @ Sowerby Bridge</p> <p>To whom it may concern.</p> <p>I am writing to object to the proposed incinerator. the original application was refused. This was based on the decision made by Mr. John Woolcock – an appointed, knowledgeable and professional official. Unlike the current problem of sewage in the waterways, residents cannot choose not to ‘bathe’ in toxic, polluted air.</p> <p>If permission was granted then very quickly the plant would increase in size – doubling, tripling or even quadrupling the output of emissions.</p> <p>Also, I am in a state of disbelief regarding the removal, from the application, of any meaningful degree of monitoring. From with monitoring in place the water authorities cannot cope with the shameful disregard, of rules and regulations, exhibited by the water utility companies.</p> <p>This incinerator would lead to a massive fall in the quality of the air which would in turn impact on a whole range of health issues for a sizeable section of Calderdale’s population.</p> <p>You hold a position which involves a duty of care both to the environment and residents of Calderdale. Although there are many things beyond your control this particular part is not.</p> <p>For you to ‘wave’ through this resubmission would amount to a lack of duty and a betrayal of all the residents of Calderdale who have invested faith in your professionalism. It would also make a mockery of all the efforts being devoted to crafting ULEZ!</p> <p>Please uphold the original decision.</p> <p>Yours faithfully</p> <p>XXXXX</p>
831	I vote NO to the Sowerby bridge incinerator of Calder Valley Skip Hire, Rochdale Road, Sowerby Bridge. XXXXX
832	I vote NO to the Sowerby bridge incinerator of Calder Valley Skip Hire, Rochdale Road, Sowerby Bridge. XXXXX

833

Hi,

I am writing to express my strong objection to the proposed construction of an incinerator at Rochdale Road, Sowerby Bridge, which is alarmingly close to our residential community. The decision to place such a facility within proximity to homes where families reside is not only inconsiderate but also poses significant health and environmental risks.

First and foremost, the emissions from incinerators are a major concern. They contain harmful pollutants such as dioxins, furans, mercury, and particulate matter, which can have detrimental effects on human health, particularly on the respiratory system.

The World Health Organization has classified some of these substances as carcinogenic, and their presence in our air could increase the risk of cancer and other serious illnesses among residents.

Furthermore, the environmental impact cannot be overlooked. Incinerators contribute to air, soil, and water pollution, and they undermine recycling efforts by burning materials that could otherwise be reused or recycled.

The long-term ecological damage that could result from the incinerator's operation is unacceptable. Additionally, the quality of life in our community is at stake.

The presence of an incinerator would likely lead to increased traffic from waste transport vehicles, noise pollution, and a decrease in property values.

These factors combined would erode the peaceful and safe atmosphere that our neighbourhood has always cherished. In light of these concerns, I urge you to reconsider the placement of the incinerator. There are alternative waste management solutions that are more environmentally friendly and pose less risk to public health, such as recycling and composting programs, which I strongly advocate for.

I hope that you will take the voices of our community into account and make a decision that prioritizes the health and well-being of its residents. We are prepared to support this matter through all necessary means, including legal action if required.

Thank you for your attention to this urgent matter. I look forward to your prompt response.

Sincerely,

XXXXX

834 Good afternoon,

I wish to object the granting of an Environmental Permit for an incinerator at the Belmont site in Sowerby Bridge. There is an absence of meteorological data for the wooded site at the bottom of the deep sided Ryburn valley which is prone to temperature inversions. A 12 metre chimney stack height is wholly inadequate on a site at the bottom of 140 metre deep, highly populated valley. The site is prone to flooding and is unsuitable for waste handling operations. Noise and odour is inappropriate for a highly populated valley. Calder Valley Skip Hire and its holding company the Leo Group have shown they are unsuitable operators of an incinerator with breaches of operating hour restrictions, animal by product management infractions, health and safety breaches that have caused injury and death, a major fire on site and environmental pollution during flooding.

Thanks  
XXXXX

835 Dear Calderdale,

I am writing to formally object to the proposed operation of the incinerator in Sowerby Bridge based on the following grounds:

In July 2023, a Government Planning Inspector rejected the application for the incinerator citing concerns about the discharge of waste gases and the associated risks to the health of local residents and the environment. This decision underscores the serious nature of the potential impacts on our community.

All elected representatives and Members of Parliament have voiced their opposition to this application, reflecting the strong local objections to the project. It is important to recognise that breathing clean air is a fundamental right that must be preserved for the well-being of our community.

The emissions from the incinerator chimney are likely to be concentrated at ground level, affecting all residents in the vicinity. With nine schools located within a one-mile radius and a total of 18 schools within two miles of the chimney, the health implications for our children and residents are significant. Notably, the schools closest to the incinerator are situated above the proposed chimney height, raising concerns about exposure to harmful pollutants. Additionally, the proximity of a public footpath to the site further heightens the potential risks to public health.

The proposal relies on data from the weather station at Leeds Bradford Airport to demonstrate that the gases will disperse effectively. However, the geographical differences between the airport location and the Ryburn Valley, characterised by its steep-sided terrain and prevailing winds, suggest that emissions are more likely to be directed towards the central population area. Residents have reported instances of smoke and mist lingering in the valley for prolonged periods during windless conditions, indicating a potential threat to air quality.

There are legitimate doubts regarding the ability of CVSH to operate the incinerator safely and responsibly. Past incidents of fires and the documented flood risk associated with the site raise concerns about the operator's track record. Furthermore, inaccuracies such as providing the wrong postcode in the application indicate a lack of attention to detail and compliance with regulations.

Of particular concern is the removal of the Council's ability to request site diaries and inspection records to monitor compliance with regulations. This lack of transparency and oversight raises doubts about the operator's commitment to

ensuring the safe operation of the incinerator and protecting the health of the community.

In light of the significant risks posed to our air quality and public health, I urge you to refuse this application. The well-being of our community should be paramount, and the potential consequences of allowing the incinerator to operate are simply too high.

Thank you for your attention to this matter. I trust that you will give due consideration to the objections raised by concerned residents and make a decision that prioritizes the health and safety of the community in Sowerby Bridge.

Yours sincerely,

XXXXX



836	<p>I wish to object the granting of an Environmental Permit for an incinerator at the Belmont site in Sowerby Bridge. There is an absence of meteorological data for the wooded site at the bottom of the deep sided Ryburn valley which is prone to temperature inversions.</p> <p>A 12 metre chimney stack height is wholly inadequate on a site at the bottom of 140 metre deep, highly populated valley. The site is prone to flooding and is unsuitable for waste handling operations.</p> <p>Noise and odour is inappropriate for a highly populated valley.</p> <p>Calder Valley Skip Hire and its holding company the Leo Group have shown they are unsuitable operators of an incinerator with breaches of operating hour restrictions, animal by product management infractions, health and safety breaches that have caused injury and death, a major fire on site and environmental pollution during flooding.</p> <p>XXXXX</p>
837	<p>As a resident of Sowerby Bridge I object to the proposed incinerator.</p> <p>Regards</p>

838 I wish to object to the incinerator being proposed at Sowerby Bridge.

As you're already aware, Sowerby Bridge suffers from congestion and poor air quality. This would be detrimental and an incinerator operating at this location would only magnify the problem.

The wind blows in many different directions and no amount of computer modelling will accurately show where the pollutants will go on a daily basis. The site sits in a valley and there are many schools and houses in the area that will be impacted.

On your very own website it says Calderdale Council have a net zero target by 2038 and you're taking climate change seriously. Your draft action plan covers six key themes, three of which directly contradict the building of this incinerator.

1. Working together to influence decisions.

2 Grow a green economy

3 work with land and nature to protect us long term.

I object to this incinerator and hope as a democratically elected council, you will listen to the residents on this matter.

XXXXX

839	<p>To whomever to may concern,</p> <p>I wish to express my deep objection to the proposed incinerator at Calder Valley Skips. The environmental impact of this will be monumental and I find it incomprehensible that this is even being considered in the middle of a valley. As we are all aware the weather in Calderdale is very windy and this means that the wind will carry the polluted air from this incinerator to many schools in the local area, including my own children's school. Also, when it is foggy, the pollution will sit underneath it for us to breathe in.</p> <p>I find it very hypocritical that you have a clear air for Calderdale policy while at the same time giving this proposal even one second of thought. What does it matter if we plant trees, buy more electric cars and try and walk more around our beautiful area if we will be breathing in the pollution from an incinerator that will be spewing out pollution 24 hours a day Monday to Friday.</p> <p>Please listen to the residents who voted for you in the hope that you would listen to our views and improve our area for generations to come. You must say no to this incinerator as no good can come from it.</p> <p>Yours, a concerned Calder Valley Resident XXXXX</p>
840	<p>I still consider myself new to the area having moved up from London after XXXXX years. I have lived there for four years now.</p> <p>I've missed the deadline, but I want to express my views. We live in such a beautiful area. It'll be tragic to see incinerator approved in the local area.</p> <p>Best wishes XXXXX</p>
841A	SEE ATTACHMENT
841B	SEE ATTACHMENT

842 Dear sir / madam:

Re the email below I'd like to support the XXXXX position.

It's ridiculous the incinerator company should have been able to apply again and causes the community stress - what if it keeps happening again and again and we are always 'waiting' for the outcome?

I'm a biologist and already had a hunch they living near an incinerator wouldn't be good for people's health. A quick google and sure enough there are scientific papers showing living near an incinerator has adverse health effects. No matter how 'clean' they claim it will be. I'm sure they would feel differently if they lived right next to it or their families.

Sowerby Bridge is an already highly polluted town. I have asthma and don't wish to live near an incinerator. I'd fear for my health. It's unacceptable in terms of the health or the community that this be granted or that they're unable to apply.

If the decision of 'no' is made I don't see why they should be able to keep applying. An incinerator isn't going to suddenly become good for people's health. The science doesn't lie!

Kind regards,

XXXXX

843 Good Afternoon,

Regarding the above consultation period for the ongoing Incinerator plan - which I have recently been made aware of, I would like to object in the strongest terms.

I sent a longer letter of objection the last time the permit was applied for and would like to emphasise a particular point; as more time passes air pollution and the human health problems it causes are more understood and further regulated by government. Clean air zones were the preserve of the capital a few years ago, but not now. This is the current trend of development - to minimise air pollution, particularly in built up urban areas. Diametrically opposite to the proposed Incinerator, and its location.

The data put forward by CVSH on emissions / dispersal etc. is purely "modeling", have we not seen enough recent models which proved to be completely wrong, the air quality in Sowerby Bridge is already terrible due to traffic and stagnant air, adding a few heavy metals, pcb's and who knows what will be a force multiplier for the unhealthiness of the air.

There is no business case for the incinerator, the company has managed without it up till now, even after paying for it and significant legal bills, so its not troubling them, and no piles of noxious waste are stockpiled down there now, I would hope, awaiting the permit. CVSH has had to service a wider area, as no one in the local area wants to provide financial succour to the people behind the hated incinerator plan.

XXXXX

844	<p>Dear Sir or Madam,</p> <p>I wish to lodge my objection to the Environmental Permit application, Calderdale planning S13/006.</p> <p>I have registered objections to previous applications by Calder Valley Skip Hire, and my reasons for objecting have not altered. The steep sided valley of Ryburn Valley is totally unsuitable for an incinerator to be placed on the valley floor, as dispersal of waste products would be severely inhibited by the topology. As it is mist, cloud and smoke can be seen regularly to lie in the valley bottom.</p> <p>The modelling used by CVSH is not based on local weather patterns, so is totally irrelevant and should be discounted. This alone should discredit the application in my opinion.</p> <p>I find it amazing that this application (in all its forms) is still being let to run and has not been shut down completely, the council has the opportunity to do the right thing this time and reject it. I urge your to do so.</p> <p>Regards,</p> <p>XXXXX</p>
845	<p>I am writing to object to the proposal by Calder Valley Skip Hire to run an incinerator on their site in Sowerby Bridge. The proposal has been rejected because of the proximity to trees on the site which will affect the disposal of waste gases which is at the bottom of a narrow valley subject to frequent temperature inversions. The site is also situated off a busy main road and traffic has been severely affected recently by lorries delivering waste queuing up on both sides of the road to gain access to the site, slowing traffic considerably and increasing pollution in a vulnerable area close to schools and housing.</p>
846	<p>Dear Environmental Health team,</p> <p>Please accept this message as a renewed objection to the proposed incinerator. I understand that the application is currently under consultation once more but am slightly alarmed that I wasn't made aware of this given I have previously objected to this at each stage of the application. I wondered if the council are planning to release some communication about this prior to the deadline next week?</p> <p>Kind regards,</p>

XXXXX

847 XXXXX

Dear Sir/Madam,

RE: OBJECTION TO CVSH WASTE INCINERATION - Response to Request for Further Information- PLANNING APPLICATION Ref: S13/006.

I object in the strongest terms to ANY incineration being carried out in Sowerby Bridge and Ryburn valley.

I object for the following reasons:

- The site is unsuited for burning as it is in a deep sided, tree lined, residential valley that already suffers high pollution.
- The site is at risk from flooding.
- Insufficient site specific modelling where temperature inversions are common and wind direction in the valley is complex to predict.
- Competence is questionable of CVSH to run an incinerator.
- pollution in the area.
- Cause environmental damage.
- Have a detrimental impact on the health of local residents.
- Produce smells and dangerous fumes.
- Increase the amount of traffic.
- Increase the risk of another fire.
- Generate smoke and dangerous smog which will hang in the valley.
- Cause noise.
- Reduce the air quality in the area.
- Adversely effect the local wildlife and nature.
- Have a detrimental effect to the Green Belt which this site is situated in.
- Reduce amenity for local residents.
- Adversely affect tourism and visitors to the area.



•• Further to the above points, i am particularly concerned as I have an asthmatic condition and am sensitive to specific impurities in the air. I also suffer from Anosmia (Lack of sense of smell) so I am unable to discern if there are any impurities in the air and therefore cannot prepare in advance should there be seen or unseen pollutants present that would affect my breathing and overall health of me and my Family which includes my 21 month old Granddaughter.

I trust you will appreciate the level of opposition from the beginning from all political parties and the two local MPs, Ward Councillors and from the local community and reject this application.

Yours faithfully,

XXXXX

848

Dear sirs once again you are having further consultations regarding the incinerator at Belmont belonging to Calder Valley Skips .

It would have been good manners on the council to let residents know instead of not keeping us informed .Does the councillors not have any morals ,but of course. I bet they don't live across the road .

I can't believe it is still being considered the air pollution it will cause .

I walked my dog this morning behind the site and oh what joy to hear the birds singing ,they will be affected .Also there are deers in the woods behind the site,so please protect the environment .

Also after the last meeting the large Skip wagons were parking at the side of the road during peak times on Rochdale Road causing mayhem so what was that all about they could have driven down to the yard itself .

There has been several accidents on this road and will be more if this is allowed to continue .

So think of the AIR POLLUTION and the wild life And not the money .

Yours Sincerely

XXXXX

849

Dear sir,

With regards to the application that calder Valley Skip have made for an incinerator in the Calder Valley, I would like to express my extreme concerns and dismay about this application.

Firstly I would like to express how utterly shocked I am at the way Calderdale Council seems to be handling this situation. I made my objections at the initial consultation and have only just found out that there is now a second consultation period. Calderdale council have a duty of care to inform all parties concerned of any major developments within an application process, this statutory obligation appears to have not been adhered to by Calderdale Council, as I was not informed of the second consultation period and apparently many others have also not been informed. Fortunately I found out just in time via social media, as many others have also done. Was this 'omission' done on purpose or is the planning process still "not fit for purpose" as the government inspectorate concluded earlier this year?

Anyway, onto the matter in hand, the erection of an incinerator at the bottom of a valley in a densely populated area! I live in Norland above where the chimney of this incinerator will emit toxins, chemicals and other pollutants into the atmosphere. The air quality in Sowerby Bridge is already very poor due to the inept council not being able to resolve traffic congestion through the area! On many occasions, from Norland I have seen a temperature inversion causing fog, exhaust fumes and other pollutants being trapped in the Calder and Ryburne valleys. Adding another source of contaminants and toxins into this mix will only cause more health issues and problems for the local inhabitants. The siting of an incinerator in a Valley with the top of the chimney below the valley top is at the very worst, insane and at the very least very negligent in protecting the environment and local inhabitants. Allowing this to happen appears to contravene all environmental planning and development plans that are enforce at this moment in time. We should not be incinerating anything and releasing, toxins and chemicals into the environment. There are far cleaner ways of disposing of organic matter than an incinerator, and I urge you to reject this application so that our children and other vulnerable people can rest assured, they will not have the air they breathe contaminated with any more pollutants.

Please add my email address to your database so that your obligation to inform me of any changes in application status is relayed to me as soon as possible.

Yours faithfully  
XXXXX

850 Dear Sir/Madam,

I am writing regarding the 14 day second consultation period which I have been made aware of through a third party. As I am a local resident and have previously objected to this matter I find it disappointing and somewhat disturbing that you have not made me aware of this process.

I find that your lack of communication and understanding of this matter towards local residents and the impact on their health disturbing to the point that you are not prepared to inform them of this process. Is there a reason for this?

You as a council representing the community seem to be going to extraordinary lengths not to inform residents of this process. This is not a transparent process, as I feel that there is no openness from the council.

Is this a breach of your own constitutional process?

On examining the Environmental Permit Application I find that there are many discrepancies which should invalidate the application. Has the council officers read and verified the information given in this document?

I write this objection/ comments as I can see that should the officers grant the application then another Post Office, Grenfell, Asbestos and Contaminated Blood to name just a few scenarios will occur in our beautiful town and surrounding area.

Will the council officers take accountability for their actions, given that every bad decision has consequences affecting many innocent lives, your actions have far reaching consequences for our communities. The Council has a Statutory responsibility to protect the public.

The council should not be going against the decision of HM inspectorate who denied the application.

Again I strongly object to this Environmental Permit being granted.

Local resident.

XXXXX

851 Not correct email (is the same email as 850 but saved as a different person)

852

I, XXXXX of XXXXX formally object to the latest Calder Valley Skip Hire Permit Application for a Small Waste Incinerator Plant (SWIP) in Sowerby Bridge ref. S13/006

I object for the following reasons:

1. An original SWIP Permit application (APP/EPR/603) was turned down in 2018 on the basis of insufficient evidence to guarantee air quality for residents and surrounding businesses, in that it could not be guaranteed that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.
2. A virtually identical Permit application of August 5th 2020 SWIP was refused at appeal on the 5th July 2023 by Government Planning Inspector John Woolcock. The Government Planning Inspector refused a permit stating he was “unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”
3. The virtually identical Permit application of August 5th 2020 SWIP (refused at appeal) totally relied 100% on an ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools.
4. The current new application ref. S13/006 of Feb 20th 2024 relies totally 100% on the same ADMS computer model purely functioning not on local actual weather data but on programmed weather data from the totally non-compatible or comparable area of Yeadon / Leeds Bradford Airport, which is located on the top of a hill with very few surrounding residential homes and businesses and no schools.
5. The current new application ref. S13/006 of Feb 20th 2024 has the same height and size of waste gas exhaust discharge stack and appears to be a resubmission of the application dated Aug 5th 2020 but with added information stated as an ‘independent review’ by RPS on behalf of CVSH. The independent review was done by CERC (Cambridge Environmental Research Consultants) to verify the treatment of trees within the air quality assessment by RPS.  
The review should be not be taken into consideration and the permit application should be refused as it does not contain an “independent” review. CERC are the producers of the ADMS air modelling software that RPS used for this application. CERC have a vested interest in not showing up problems with their software or upsetting their customers (CVSH).  
The CERC report should be disregarded as unreliable in that it stated that ‘the approach adopted within the air dispersion modelling is considered appropriate and there are no other suitable models/software available’; when this is not the case and other suitable models/software are available.
6. The ADMS computer model data put forward in the permit application is not fit for purpose in that it has seriously not

taken into account the effect of the specific weather condition of inversion in a valley bottom; it has only taken into account the condition of inversion with regard to weather data programmed for the flow and dispersion of waste gases from a hill top exhaust stack as located at Yeadon Airport.

Inversion being deviation from the normal change of an atmospheric property in comparing the flow and dispersion of waste gases from a low valley bottom in close proximity trees and buildings, with the high altitude of an open hill top site as per weather data used for the permit application submitted.

As the application for the Permit relies 100% on the computer model, the permit application should once again be refused as being incorrectly assumptive and as such inaccurate in not taking into account the site being located in a valley bottom with a history of detrimental inversion.

As such the ADMS computer model data as submitted is unsafe in its attempt to guarantee safeguarding of human health and the environment.

7. The proposed Incinerator site and waste exhaust fume plume smoke stack is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2) and is identified as subject to a Council and local Environmental Health initiative to improve the air quality.

The permit should be refused given the historic evidence of smoke and low cloud hanging in the valley bottom due to the unique terrain which is the exact opposite of the computer model figures from Yeadon Airport, the waste exhaust fumes from the proposed smoke stack would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

8. As the proposed Incinerator site is only 670 metres down-wind from the Sowerby Bridge area which is an Air Quality Management Area, (AQMA2), the additional travel to and from the site through Sowerby Bridge of extra diesel fuelled waggons transporting 2 tonnes per hour (Monday to Friday for 52 weeks per year) and then re-transporting away the non-combustible waste to landfill; would in the first instance further add to the already damaging traffic congestion and in the second instance damage even further the air quality of Management Area, (AQMA2)

The permit should be refused as the extra traffic throughput, poisonous exhaust fumes and congestion would have a seriously detrimental effect on the air quality of Management Area, (AQMA2) and become worse rather than improve.

9. With regard to monitoring; the August 2020 CVSH permit application states "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time."

The January 2024 application by CVSH should be refused as CVSH have removed the statement "CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time."

The Permit should also be refused as there would be a restriction if not an impossibility for CMBC to continuously monitor emissions to air in order to confirm that levels are within IED emission limits, given the removal of the power of CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time.

As such the permit application does not fulfil its obligation in guaranteeing that necessary measures will be taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC.

10. The new application report dated 26 Jan 2024 submitted by RPS on behalf of CVSH states that the refusal at appeal decision by Government Inspector John Woolcock is “perverse” and “procedurally unfair” but yet did not take up their option to take it to Judicial Review.

The permit application should be refused as it appears both perverse and procedurally unfair of CVSH in submitting what they state is basically the same application as in 1.5.5 in the new application report.

The permit application should furthermore be refused as it appears to be abuse of process by CVSH in not taking their option to take the original appeal decision to Judicial Review, but alternatively submitting what CVSH state is basically the same application on 20th Feb 2024 as was refused some 7months later on 5th July 2023 by Government Inspector John Woolcock.

### Summary

A) A previous permit virtually the same as the Feb 2024 application which included provisions for CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time, was turned down in 2018 on the basis of insufficient evidence to guarantee air quality for residents and surrounding businesses, in that it could not be guaranteed that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.

B) A previous permit virtually the same as the Feb 2024 application which included provisions for CMBC to request copies of the site diary and site inspection records relating to SWIP operations at any time, was refused at appeal by an independent government officer on the 5th July 2023 by Government Planning Inspector John Woolcock who stated he was “unable to find that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”

C) The latest application dated Feb 2024 is essentially the same application as the one turned down in 2018 and virtually the same as the one refused at appeal on 5th July 2023 but with s CVSH have removed the statement “CMBC may request copies of the site diary and site inspection records relating to SWIP operations at any time.”

### Conclusions

Firstly the latest permit application should be rejected as it still categorically fails to guarantee that the incinerator would not materially harm the health and safety of users of the nearby Air Quality Management Area (AQMA2) and the site and its surroundings and the quality and enjoyment of the environment.

Secondly the latest permit application should be rejected as it still categorically fails to guarantee that waste gases from the incinerator would be discharged in a controlled way as to safeguard human health and the environment”

Thirdly the latest permit application should be rejected as it would essentially allow CVSH to pump waste exhaust gases at the rate of burning two tonnes per hour into the environment 670 m from nearby Air Quality Management Area 2 Monday to Friday for 52 weeks per year and now without the power of any Monitoring from Calderdale MBC

Yours faithfully

XXXXX



853 To whom it may concern,

I'm appalled that Calder valley skip hire have yet again been given chance to plan the incinerator despite the public's clear views on this and all the objections. Why are local residents being ignored?

It seems they are not going to stop until they get their own way and they're clearly prepared to use whatever tactics they can.

The local residents need to have their say on it, as it will impact our health, the environment, the traffic pollution and possibly the future economy/ house prices. It's about time our views were heard.

Please accept this as yet another objection.

Yours sincerely

XXXXX

854 I object to any incineration at Calder Valley Waste Skips business due to the stench it emits which permeates the air on both sides of the valley and into school areas. Also the continuous grinding noise which doesn't allow residents to rest outside.

XXXXX

855 Hello

I've lived in the Ryburn valley for most of my years.

Im writing to object , to this terrible incinerator going ahead.

I've spent years Coaching XXXXX and spent Hours of time too . The last thing I want is children I. The valley suffering with health , Lung breathing problems as they grow older, I do hope with all my heart this teriible Incinerator DOESNT GO AHEAD .

Ive also spent many years and a lot of ££ renovating my home , so I also don't want house prices to drop.

You can use this letter towards any objections

XXXXX

856 Dear sir / madam:

Re the email below I'd like to support The XXXXX position.

It's ridiculous the incinerator company should have been able to apply again and causes the community stress - what if it keeps happening again and again and we are always 'waiting' for the outcome?

I'm a biologist and already had a hunch they living near an incinerator wouldn't be good for people's health. A quick google and sure enough there are scientific papers showing living near an incinerator has adverse health effects. No matter how 'clean' they claim it will be. I'm sure they would feel differently if they lived right next to it or their families.

Sowerby Bridge is an already highly polluted town. I have asthma and don't wish to live near an incinerator. I'd fear for my health. It's unacceptable in terms of the health or the community that this be granted or that they're unable to apply.

If the decision of 'no' is made I don't see why they should be able to keep applying. An incinerator isn't going to suddenly become good for people's health. The science doesn't lie!

Kind regards,

XXXXX

857 SEE ATTACHMENT

858A S13/006  
Consultation Comments from local resident XXXXX

I have read some of the comments submitted by other residents and fully support those who are asking significant questions about the failure of this application to meet the requirements of the current legislation and guidance.

There is clear National advice that it is preferable to run planning applications in parallel to permit applications as the two are interrelated. This has not taken place here consequently there are significant issues – for example much has been said by both the applicant's agents, the public consultees and the previous EP appeal Inspector about the effect of the protected trees on the plume of noxious gases from the incinerator, but nothing has been submitted regarding the effect of these gases on the protected woodland and its supportive animal life itself. The Woodland Management plan required by the planning approval does not appear to exist.

A second issue is the internal layout of the SWIP building. This has been withdrawn from the EP Application but remains on the Planning Approval, reference RYLEY 977/19/32A Jun 19, so consultees must assume that this remains the relevant document.

Apart from the lack of recommended safety space around the various pieces of equipment that is shown in the equipment manufacturer's leaflet there is a fundamental problem with the amount of storage shown for feedstock.

The plan shows an area of 4.8x 4.8 metres for feedstock storage - equivalent to 23m<sup>3</sup> per metre height if such material can be stacked vertically which must be doubtful - it shows an open fronted storage area.

RDF density is shown as varying from 120kg to 250kg per cubic metre depending which source of evidence is used say - average 185kg so 1 Tonne has a volume of  $(1000/185) = 5.4$  cubic metres. No RDF density is shown in the application. The required number of hours storage are 6 pm to 7 am or 13 hours which at a burn rate of 2 tons per hour is 26 tonnes or say 24 tonnes as the incinerator can be preloaded.

That would require  $(24 \times 5.4)$  cubic metres of storage, which is 130 cubic metres.

The internal height of the building is 3.2m at the eaves and 5.4 at the ridge.

It is doubtful that a JCB type loader could stack higher than 3 metres and that would be a conical heap.

It looks like they could probably store to an average 2 metre height which would be a total of  $2 \times 23$  cubic metres = 46 cubic metres of the 130 required which is about a third of what is needed - it would not even work at 1 ton per hour. The incinerator would be subject to continual stop start programme increasing its inefficiency.

How will this be resolved? Would the Local Authority have no option but to consider a planning application for a further extension in Green Belt? That option has previously been declined.

858B The storage issue may become irrelevant if the conditions in the planning approvals 17/00113 /WAM and 17/00114/ VAR are complied with and enforced. These conditions do not allow the SWIP to operate without the drying plant being available. Planning conditions make the drying plant unavailable from 18.00 hrs to 07.00 hours.

From 17/00113/WAM

13) (a) Except as provided by (b) - (c) below no vehicular movements, waste movements, movement of skips, recycling operations or operation of the drying plant authorised or required by this permission or by permission 17/00114/VAR shall be carried out on the site except between the following times: 07:00 hrs to 18:00 hrs Mondays to Fridays; and, 08:00 to 14:00 on Saturdays.

(b) The SWIP hereby approved shall only operate for 24 hours a day on Monday to Friday. On those days during the hours between 00:00 hrs to 07:00 hrs and between 18:00 hrs to 00:00 hrs the SWIP shall only operate when all of the roller shutter doors in the building which contains the SWIP are closed. The SWIP shall not operate on Saturdays, Sundays, or on Bank/Public Holidays.

(c) The above time restrictions shall not apply to environmental monitoring. (d) Save for environmental monitoring there shall be no other working on Sundays or on Bank/Public Holidays.

6) Before the first operation of the SWIP hereby approved details of the Drying Plant and the connections to it from the SWIP shall be submitted to and approved in writing by the Local Planning Authority. The Drying Plant and the connections to it shall be completed in accordance with the approved details before the first operation of the SWIP and shall be maintained as installed. The SWIP shall not be operated in the event that the Drying Plant is not available for use.

7) Before the first operation of the SWIP, a scheme for its connection to the National Grid for the export of electricity shall be submitted to and approved in writing by the Local Planning Authority. The connection shall be completed in accordance with the approved details before the first operation of the SWIP and shall be maintained as installed. The SWIP shall not be operated in the event that the connection to the National Grid for the export of electricity is not available for use.

859	<p>It is disappointing that my previous consultation response did not receive an acknowledgement. This is completely unacceptable. Please reply to this consultation response.</p> <p>Looking at the additional information provided, I have serious concerns regarding the 'potentially significant emissions of Arsenic as a result of the development.' Bureau Veritas confirms this could be 'controlled through appropriate permit emission limit values.' How would the Council implement these controls? Does the Council have an appropriate sanctioning mechanism to penalise the applicant if they break these values? What is the Council's current track record of penalising applications that break environmental permits?</p> <p>Moreover, it is evident from the reports on 'the effects of trees on dispersion' that there are insufficient analytical models to fully understand the effects of this variable. Both Bureau Veritas and Making Complex Easy confirm this in their reports. Bureau Veritas also states the only way to understand this effect is to 'complete monitoring with the SWIP in operation.' If the Permit is granted and monitoring discloses that the effect does contribute to worsening public health, we would already be in a situation where public health has been compromised. This underscores the need to decline the application, as we cannot categorically ensure that the incinerator won't affect human health. This aligns with the inspector's conclusion last year, which stated, "I am unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment."</p>
860	<p>I wish to register my strong objection to any permit for further incineration to take place at the Belmont Industrial estate by Calder Valley Skip Hire.</p> <p>In my opinion the company has complete disregard to its responsibility to the local community. The local residents have already said they do not trust the operators to stay within the law ( having evidence of items being disposed of outwith the permit terms) and yet despite having lost their appeal, the company have the gall to try again.</p> <p>I regard this as vexatious behaviour and deplore the fact that it is costing council time and money which could be better spent on other things. One of these most pertinently is to reduce the risk of asthma and poor air quality. I am sure the Public Health team cannot support further incineration causing particulates and not just gasses e.g. NO and NO2. I also note there is mention of arsenic and other heavy elements such as lead being on site and I worry about this leaching into the adjacent river.</p> <p>Please do not allow this permit and refuse all subsequent applications.</p> <p>Yours faithfully XXXXX</p>

861 I do not understand how after such a long time and numerous refusals this is still being debated. We have all objected many times and it is obviously not good for our area environmentally as well as the impact on traffic congestion on Rochdale Road. Are we just going to be tortured with this till we submit.

Regards

XXXXX

I am writing again regarding the latest application for an environmental Permit for the operation of a Small Waste Incinerator Plant (SWIP) at Calder Valley Skip Hire's Belmont site. We wish to object to this latest application in the strongest possible terms.

I am extremely concerned about the environmental impact the incinerator would have at this location and call on the council to refuse the application.

In particular, I wish to note the following points:

Inability to Enforce Permit Conditions:

The new application operations on the Belmont site would be governed by two separate permits, one relating to the SWOP and the broader EA permit. When CVSH applied for a permit for a site at Mearclough, Calderdale's Cabinet refused this, citing "concerns about the enforceability and any related concerns in a situation where operations on the site are governed by two separate permits; Having considered both legal advice and information from Defra, it is concluded that there is insufficient certainty about the ability of the council to enforce permit conditions...". This argument applies equally to the situation at Belmont, and therefore the Permit should be refused.

Impact on Air Quality:

The site is wholly unsuited for the burning of waste, being in a steep sided, heavily wooded, densely populated valley, very close to an Air Quality Management Area (AQMA) as well as being within 2km of a dozen schools. Recreational areas, homes and businesses are all within the immediate vicinity. The air quality through the nearby Sowerby Bridge town centre is already very poor, with levels of pollutants regularly exceeding lawful limits.

There is evidence to suggest that the operation of the incinerator would exacerbate the pollution problem in the valley, with an increase of NOx and small particulate matter, which would worsen the health of local residents.

Indeed, in his judgement of 5th July 2023, Inspector John Woolcock concluded:

" Taking all the above into account, I consider that the appeal should be dismissed because I am not satisfied on the

evidence adduced that the proposal complies with IED Article 46 1., which requires that waste gases from waste incineration plants and waste co-incineration plants shall be discharged in a controlled way by means of a stack the height of which is calculated in such a way as to safeguard human health and the environment. Furthermore, I am unable to find that the necessary measures have been taken to ensure that waste management would be carried out without endangering human health, without harming the environment and, in particular without risk to air, in compliance with Article 13 of the Waste Framework Directive 2008/98/EC."

The incidence of lung disease in Calderdale is notably higher than the rest of West Yorkshire, and around 4.5% of all adult mortality in Calderdale is estimated to be due to the long term exposure to harmful particulate air pollution. The borough ranks amongst some of the worst local authorities in the country for premature death rates due to respiratory disease.

The council has a duty to work to reduce air pollution, and therefore should not grant an application that may well worsen the problem. When Calderdale Council refused the Mearclough application in 2018, the reasons for refusal stated: It is accepted that there is no safe level of NOx and it is accepted that the SWIP site could impact on an AQMA. The application does not provide reasonable grounds to believe that it will not lead to an increase in NOx levels within the locality, but again there is no certainty that any action could be taken in the event of a breach." The Belmont site is equidistant to the Sowerby Bridge AQMA, and therefore this statement applies equally to the current application as to the former.

#### Health Impacts:

Dioxins are produced when burning Refuse Derived Fuel (RDF) and are described by the World Health Organisation (WHO) as "highly toxic and can cause reproductive and developmental problems, damage the immune system, interfere with hormones and can cause cancer". Dioxins are classified as Persistent Organic Pollutants and any analysis of potential receptors should include local businesses such as the Sowerby Bridge Day Nursery which is just down-stream from CVSH.

#### Flooding:

The Calder Valley Skip Hire site at Belmont is situated adjacent to the River Ryburn, and has suffered flooding on numerous occasions. The Government's Flood Risk Checking Service shows:



The area around Calder Valley Skip Hire Ltd, Sowerby Bridge, HX6 3LL has a:

- high risk of surface water flooding
- medium risk of flooding from rivers and the sea

There is insufficient evidence to suggest that this flooding can be either eliminated or adequately mitigated. Any potential flooding of the site, which is possible from both surface water and river flooding, could be disastrous for the river and its ecosystems. Furthermore, we understand the flood bund, which CVSH installed on the site along the riverbank following a previous flooding incident, has a gap to allow surface water to leave the site. This would surely render it ineffective in the event of a flood incident involving raised river levels.

Insufficient data modelling:

The applicant has used evidence from two sets of computer-modelling to support the application. One model shows the temperature distribution and residence time within the combustion chamber in order to show that a high enough temperature is reached for long enough to reduce dioxins, furans and particulates within the gas flow to acceptable levels for the emissions. A second computer-modelling programme is used to simulate the dispersion of those emissions. In both cases these models only show results for a prescribed set of input conditions. They do not represent real world conditions which are variable and subject to abnormal or unforeseen events.

The combustion modelling is also based on typical Refuse Derived Fuel (RDF) waste composition. This requires careful sorting and segregation which relies on human intervention to obtain the correct mix of materials. The actual RDF is likely to have significant variations, thus rendering the combustion modelling unreliable.

In addition, Inspector Woolcock noted in his report:

9. Because of an error at the planning application stage in the AOD of the proposed stack, a previous run of the model inadvertently assessed a stack height 9 m higher than the correct discharge height.<sup>40</sup> The results from this modelling do not provide any reassurance about the robustness of the stack height calculation now relied upon by the appellant because that run of the model also dealt with the trees solely by means of surface roughness length.

Weather Statistics:

Weather data has been used for the dispersion modelling. The data used has come from Leeds Bradford Airport and Bingley. Leeds Bradford Airport is 20 miles away, and at an elevation of 208m it is England's highest airport, with a totally open aspect in all directions. The site of the proposed incinerator, in a heavily wooded, narrow valley bottom is not comparable in any way. We would therefore argue that this renders the dispersion modelling analysis invalid.

In addition, the local topography is such that predicting dispersion in the bottom of a narrow valley is extremely complicated and normal dispersion rules do not apply. The incinerator lies in the shadow of Norland Moor which is at 280m elevation and causes a unique set of conditions. Dispersion is further complicated by the height of trees surrounded by the site.

The Ryburn Valley is known locally for its Inversions, which cause low-lying cloud to remain in the valley for hours and sometimes days. During the fire on the CVSH site in 2017, the smoke lingered for several days. This gives a clear illustration of the effects of smoke in the valley, and it is reasonable to assume that any fumes from the incinerator would behave in the same way.

#### Environmental Impact:

According to UKWIN (UK Without Incineration Network), a national crossparty group who are calling for a moratorium on all new incinerators in England (Scotland and Wales having already passed such a moratorium), every tonne of waste that is incinerated emits one tonne of carbon dioxide into the atmosphere, approximately half of which is derived from fossil fuels.

In addition, the UK already has more incinerator capacity than it needs, and in the vast majority of regions, more waste is sent to incinerators than is recycled. There is a clear comparison to be drawn between the rise of incineration rates and a decrease in recycling rates. The proposed incinerator would create a further capacity of 10,000 tonnes, which when burnt would release 10,000 tonnes of carbon dioxide into the atmosphere and would inevitably have an impact on recycling rates locally.

#### Competence of the Operator

The Council must refuse an application for an environmental permit if it considers that the applicant will not operate the

regulated facility in accordance with the permit.

Unfortunately, Calder Valley Skip Hire has a poor relationship with its neighbours who allege that they have failed to abide by existing conditions resulting in hundreds of complaints. Council Officers had to intervene in 2015 after large stockpiles of waste accumulated on the Belmont site, causing a foul stench to linger throughout Sowerby Bridge. Furthermore, there was a large fire on the site in 2017, and smoke from this lingered in the valley for several days, as noted previously in our objection.

Guidance for Council Officers on the competence of an operator can include circumstances where the Council believes that the operator lacks the management systems or competence to run the installation according to the application or any permit conditions.

Conclusion:

I believe that the combination of insufficient data modelling, unreliable data used from inappropriate sources, and the concerns raised by Inspector Woolcock should be sufficient reasons to reject this and all subsequent applications for an environmental permit at this site.

Yours sincerely

XXXXX

863 Objection to the granting of an Environmental Permit to Calder Valley Skip Hire

XXXXX

1. Incorrect information on the Application form for a permit to operate Schedule 13 small waste incineration plant:

2.1 Registered Office address of the operator is incorrect it should be: Clayton Hall Sand Quarry Dawson Lane, Whittle-Le-Woods, Chorley, England, PR6 7DT

2.2 Holding Companies. The operator is a subsidiary of a holding company the holding company is: NWM HOLDINGS LIMITED Company number 03921474

6.1 Description of plant

I would like to see evidence of the date of manufacture of the incinerator to confirm the manufacture date, for example machine model and serial number.

Rate of incineration (kg/h) is given at 2Kg per hour which evidence of lack of expertise in incineration.

11: Declarations

Joe Sawrij is no longer a director and the application is not signed.

2. Flooding

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"There have been no known flooding events at the site. The Environment Agency indicative Flood Maps show that the site is not located near an area of flooding. The flood risk assessment concludes that the flood risk is low to negligible."

The Environment Agency says:

The area around Calder Valley Skip Hire Ltd, Sowerby Bridge, HX6 3LL has a

- high risk of surface water flooding
- medium risk of flooding from rivers

The site drainage plan does not show the gully which will run under the dryer and heat transfer pipe.

3. Heat and energy recovery process / mechanical drying of inert soils and aggregates

Paragraph 5.9 of the Core Guidance state

"Where proposals involve substantial expenditure, whether on construction work, equipment, software, procedures or training, operators should normally make an application when they have drawn up full designs but before any work commences"

APPENDIX 3-APPEAL A-SCHEDULE OF CONDITIONS

8) Before the first operation of the SWIP hereby approved details of the Drying Plant and the connections to it from the SWIP shall be submitted to and approved in writing by the Local Planning Authority. The Drying Plant and the connections to it shall be completed in accordance with the approved details before the first operation of the SWIP and

shall be maintained as installed. The SWIP shall not be operated in the event that the Drying Plant is not available for use.

13) no vehicular movements, waste movements, movement of skips, recycling operations or operation of the drying plant authorised or required by this permission or by permission 17/00114/VAR shall be carried out on the site except between the following times: 07:00 hrs to 18:00 hrs Mondays to Fridays and 08:00 to 14:00 on Saturdays

There is no clear plan or description of how the dryer will operate or designs showing how the SWIP is connected to the dryer. There is little information about pollution control, how the individual parts of the plant are connected, heat transfer or electrical system.

The dryer specified is the Stronga Flowdrya FD17 which is designed for drying woodchip, wood shavings, sawdust, bark, cereals, separated and raw digestate (animal waste), compost, poultry manure, sewage sludge RDF, paper pulp, organic fraction waste. The dryer is not designed for drying aggregates as specified in the application. Furthermore the dryer can only be operated from 7:00 – 18:00, the SWIP can only be operated during the operational hours of the drying plant.

If the dryer can only operate during the day how will energy be recovered from 18:00 to 7:00? How does this impact on the R1 calculations?

#### 4. Review and Record Keeping

No evidence of maintenance records for the SWIP which has been installed for a number of years.

#### 6. Single Permit

As waste is received and processed on the Waste Transfer Station site, as is the Dryer which is integral to the process. The whole site should be subject to one permit issued by the Environment Agency.

#### 7. Lack of information and co-operation from Calderdale Council

On 4th June 2024 a number of questions were asked at the Cabinet meeting concerning the incinerator permit including issues around the publication of information and objections. The answer was, “it is not a requirement to provide an answer to the public” The Council has refused to engage with the public despite the 858 objections. The council is not meeting its obligations by refusing to debate or communicate with the public. I expect to see all of the objections published with comprehensive answers guided by the consultant and the Environment Agency.

864

Hi,

Please find below further comments following the publication of CVSH answers to CMBC questions.

But before that I would like CMBC to investigate whether they properly informed all the people who originally commented on the proposed EP.

I only found out that the process had re-started on the local grapevine, which has curtailed somewhat the timescale for me to respond again.

In discussions with a number of other local people who originally commented only 1 out of 12 has been notified, and only 1 out of the 3 Sowerby Bridge councillors were notified.

Even if CMBC were relying on people looking at their website to be informed, it is unfair that the process was recommenced on 23rd May when the due date for information from the applicant was 30th May.

This has created a democratic deficit that needs fixing. I would suggest that once all those people who originally commented/objected have been emailed then the 14 day further consultation period should start again.

Further comments (objections) to the proposed incinerator in Sowerby Bridge.

Applicants Competence

CVSH Ltd was sold to new owners on 5th April 2024 - has due diligence been carried out on the new owners/directors as to their suitability to run this incinerator?

Since my previous objection email I have found another suspicious incidence of misinformation in the application. RPS included a map of "human receptors" within 1km of the site.

There are a number of glaring omissions on this map which bring into question the accuracy of everything else that is submitted.

Here are the omissions:

Allotments - the allotments on Fore Lane below Sacred Hearts school aren't marked

Care Homes - the Anchor Homes sheltered housing on St Peter's Ave at Flowerbank aren't marked

Retail Facilities - Tesco Superstore and the parade of shops on West Street aren't marked

Outdoor Recreation Facilities - all of the following aren't marked on the map:

Ryburn Golf Club

Sowerby Bridge Cricket Club and adjacent football pitches

Sowerby St Peters Cricket Club

Sowerby Tennis and Bowling Club

Triangle Cricket Club

West End Bowling Club

If these things had been highlighted on the map then that would have given a completely different impression of the

potential affects on human activity within 1km of the incinerator.

Were these things left off deliberately? Or was it negligence or incompetence? Whatever the answer it doesn't provide confidence that the applicant is serious about running the incinerator competently.

#### Dispersion

I wrote at length about this in my previous objection. But I have some new information which again brings into doubt the adequacy of the applicants assertion that their modelling is robust. The only SWIP that CMBC currently regulates is at Cooper Bridge. That SWIP which is smaller in output to the one which is planned here has a 30m stack and it isn't in the bottom of a deep steep sided valley, this convinces me that the stack at CVSH won't be able to disperse the emissions safely beyond human activity.

#### Approver and Regulator

I believe CMBC should recuse themselves from approving this incinerator because they have been proven to have been biased towards approval in the past. CMBC should either refuse permission or leave it undetermined so that the applicant can appeal to the planning inspectorate who were the previous arbiter on this.

Additionally I am not convinced that CMBC should be the regulator in the long term. My understanding is that if an incinerator and associated waste transfer station are dependent on each other then the regulator should be the Environment Agency. The incinerator here is dependent on dried RDF from the waste transfer station and the waste transfer station is dependent on heat from the incinerator to dry the raw material. I also believe that if an incinerator is being used to for energy recovery (R1) it should be also regulated by the Environment Agency. Another reason why this should be passed to the Environment Agency is because CMBC has limited experience in regulating a SWIP. The SWIP at Cooper Bridge is completely different - it uses more refined RDF which is delivered to site by a third party and the SWIP itself is not an incinerator - it is a gasification plant. It is also a known fact that CMBC have limited resources to be able to properly monitor and regulate such activity. Finally on this subject - when CMBC refused a similar application for a SWIP by this applicant at Mearclough, one of the reasons for refusal was the difficulty to regulate posed by there being 2 regulators (CMBC and EA). The same situation applies at Belmont.

#### Potential Fire Risks nearby

Has the proximity of flammable substances nearby been considered? e.g.

Most importantly the above ground natural gas pumping station adjacent to the incinerator site and secondly the petrol station at Belmont.

#### Conclusion

Because we know from the planning inspector John Woolcock that the emissions from this SWIP can be harmful to human health and the environment.

CMBC must err on the side of caution and show that they care for the health of their residents.

There are too many doubts about the safe dispersion of gases for the council to be able to approve it e.g.

Height of Stack

Inability to model accurately weather conditions at this site

Temperature Inversions

Previous planning inspector's judgement on the affect of trees surrounding the site

Cumulative effect of the AQMA

Incompetence of the past and future operators

Cumulative arsenic concentrations

Just because the applicant has spent a lot of money and just because they have planning permission it can't be a given that than an environmental permit is automatically granted, the health and safety of the local population is far too precious for that.

I know that this is on a different scale to the recent scandals involving government bodies such as Post Office, Infected bloods, Hillsborough, Windrush and Grenfell, but this incinerator has all the hallmarks of a scandal waiting to happen i.e. government officials ignoring the evidence of local people in favour of computer generated modelling provided by a business. CMBC should be relying on the judgement of the independent government planning inspector and not the modelling paid for by the applicant.

Paraphrasing from Magna Carta "Let Right Be Done" - and refuse this incinerator application

XXXXX



866

Dear Community Safety

I object to the application for an environmental Permit for Schedule 13 Small Waste Incineration Plant by Calder Valley Skip Hire (CVSH) Ltd (Reference: S13/006).

Reasons being;

The application should not be considered as a decision was recently made on the permit application and to resubmit a further application is a abuse of process. The appropriate recourse was judicial review of the inspectors decision and this was not exercised. It is unfair that local residents are now in a position where they have to raise objections on resubmitted application having previously spent time and money challenging the original permit application. The same residents are prejudiced by the action of CVSH, who have the funds to continually push their agenda. Furthermore, the residents are only given a short amount of time to review and consider the presented evidence, which is complex in nature and they are not in a position to obtain their own expert advice. In any event, residents should not be placed in this position, given the application for this permit has already been considered and denied through a fair judicial process. Notwithstanding the above, the additional information provided does not sufficiently resolve the issues highlighted from the original inspectors findings. Calderdale Borough Council air quality assessment peer review conducted by Bureau Veritas (Project No. 21621154) concludes that the modelling data considered is inherently uncertain due to unique topography and weather. It also states that the applicant has not completed sensitivity tests using NWP for any other pollutants besides NO2 and has been assessed using out of date reference documents for waste incineration. Due to the numerous highlighted unknowns and inconsistencies from the review, the risks involved in approving this permit are unacceptable.

XXXXX

867 Dear community safety team

The additional material supplied in the most recent application in regards to this permit does not address the major flaws and risks involved in intended operation of the incinerator by CVSH in Sowerby Bridge.

The Air Quality Assessment Peer Review conducted by Bureau Veritas (Project No. 21621154) highlights some unacceptable flaws in the assessment presented by CVSH such as:

- The applicant has not completed sensitivity tests using NWP for any other pollutants besides NO<sub>2</sub>, resulting in low confidence that there would be no significant effects from any pollutant of concern from the application site.
- The approach to the modelling shows inherent uncertainty and only in situ data gathering would be suitable to properly assess the risk.
- There is a risk identified in contamination of the air with significant levels of arsenic. This is significant toxicologically since a principal site for carcinogenicity is the lung. The review demands that additional mitigation for appropriately controlling arsenic emissions from the application should be sought. It is also worth noticing the very close proximity of the site to residential property as well as primary schools.
- The IRRP BAT reference document used to assess emissions limits has been withdrawn and replaced (but not considered in CVSH evidence) demonstrating use of incorrect references and general poor compliance by CVSH.
- There are several inconsistencies noted between the original report and what this Air Quality Assessment Peer Review found.

Notwithstanding the continued scientific and compliance flaws in the application by CVSH, there is an overriding unfairness in the approach by CVSH, showing a complete lack of care for legal obligations and due process. The SWIP at Belmont Industrial Estate, Rochdale Road, Sowerby Bridge was refused the environmental permit by government planning inspector John Woolcock on the 5th July 2023. CVSH did not exercise their option for judicial review at the time, effectively closing the matter of the environmental permit. This new application has circumvented the due course as it is a rehashed version of the previous one which was rejected by a final decision by the government planning inspectorate. This is an improper attempt to avoid the correct scrutiny on the matter by pushing it to a lower office to make a decision. It would be incompetent of Calderdale Council to approve this application based on the most thorough legal assessment already ruled upon by inspector John Woolcock.

The operation of the SWIP in Sowerby Bridge by CVSH represents an unacceptable risk to the environment and public health. CVSH have unfairly disregarded due process and their application has serious compliance and scientific flaws. The operation of the SWIP only stands to benefit CVSH financially at the detriment of the environment and public health.

Please carefully consider these points before making judgement on this serious matter for Calderdale and the residents of Sowerby Bridge.

XXXXX

868	SEE ATTACHMENT
869	SEE ATTACHMENT
870	SEE ATTACHMENT

871 Thank you for the opportunity to comment on CVSH's response to a Request for further information. In view of the relatively short notice, lack of publicising and it's clashing with the calling of a General Election, I am aware that a number of requests have been made to Calderdale BMC to extend this second consultation period. I would like to request this also otherwise a meaningful consultation will not be possible. In the event that such a request is not granted I will make a few brief comments and include my previous comments/objections for context.

It is to be welcomed that further information has been sought and I acknowledge that the reason for requesting these questions may not be clear to a lay member of the public. However, it seems the questions asked do not reflect a robust examination of application and the concerns I and others have raised about this application.

\*The proposed height of the stack will not reach the level of the road and therefore emissions will disperse into the trees and the environment where people live, including homes and risk serious harm to health- see 4 below

\*I am concerned that the assessment of pollutant level is based on modelling based on assumptions I believe to be seriously flawed.

\*In addition to questions of air pollution, there is a lack of clarity in the application regarding how the proposed SWIP will be operated, manufacturer's operating procedures etc, and these require further information also.

Time does not permit me to comment further so I hope there will be a positive response to the request to extend the consultation period.

Yours sincerely  
XXXXX