

## **Response by Strong Close Nursery School to the Environment Agency re Endless Energy's proposal to site an Incinerator within 500 metres of the school**

The Governing Body of Strong Close Nursery School has the following questions and concerns relating to the grant of an operating license for the proposed waste-burning incinerator at Keighley.

### **Context:**

Our Nursery School is housed in a Victorian building situated on Airedale Road less than 500m from the proposed site for the Incinerator. The NS has 48 designated places for 2 year olds and 148 places for three to five year olds. This includes 30 specialist places for children with severe and complex Special Educational Needs. Most of the children attend for a morning or afternoon session five days a week. We have been situated on this site for over 40 years.

We encourage, and expect our children to play outside throughout the day as required by the Foundation Stage curriculum and OFSTED. In fact, our outdoor area is as large as our internal space. The outdoor area offers very different educational resources to those found inside so that we can ensure high quality healthy physical, social, emotional and educational development. Our children are very young and their brains are still developing; indeed they are at the most critical and rapid stage of human development. Those with complex health needs are particularly vulnerable to any adverse elements in the environment. Any additional risk, however small, to the healthy development of this already disadvantaged group of very young children, is unacceptable.

### **Questions:**

- 1 The Bingley weather station is high above Wilsden and definitely not in the Keighley valley area where the plant would be sited so can we be reassured that the weather data used for modeling the plume from the chimney will not be from the Bingley weather station?
- 2 The Aire Valley often has low-lying cloud. On the day after Bonfire night this year when the weather was foggy it was possible to smell the smoke from the night before. Will emissions be trapped in the valley on days like these?
- 3
  - a) What are the predicted impacts from the operation of the Incinerator on the health of young children, particularly when an emergency event at the Incinerator occurs?
  - b) How will the levels of pollutants be monitored and what action will be taken if the pollution is above a safe level?
- 4 In the event of an emergency e.g. fire or toxic gas release, our concern is the protection of our Nursery children, especially due to their very close proximity to the proposed Incinerator.
  - a) Will the NS be made aware of any issues arising where pollutant levels are high enough to warrant our children not playing outside or not attending our school?
  - b) What kind of monitoring will be in place to alert us to these situations?
  - c) What action would we need to take to protect our children?

- 5 Safe ventilation throughout the NS during warmer weather necessitates opening windows. Automatic access doors have to be opened frequently throughout the day year-round to allow access to families coming and going. 'Sealing' the NS is not possible so closure is likely to be the only safe option with all the negative impacts that unplanned closures will bring.  
How could the NS remain open if a breakdown occurred at the plant requiring windows and doors to be closed?
- 6 a) How can we be sure that the children will not be adversely affected by particulates or pollutants during normal operation of the Incinerator when they play outside for extended periods?  
b) Would it be possible to have a pollution monitor installed at Strong Close so that accurate, site-specific data could be gathered and responded to, and could payment for this be built into EE's contract for all sensitive sites e.g. schools and nursing homes, nearby?
- 7 a) Will noise levels be set and will these be regularly monitored against a baseline?  
b) Will it be the site operator or the Local Authority who will investigate and resolve any complaints related to noise levels?
- 8 a) Will odour be a problem for children playing outside and families attending the NS?  
b) How will odour levels be monitored, and rectified if unacceptable, and how long will it take to put these right?  
c) Have the dust, pests and odour issues frequently reported by those living near other Incinerators been addressed and eliminated in the design of the new Incinerator?
- 9 a) How many other Incinerators have been sited within 500m of a school?  
b) What has been the impact on children and families at these sites?
- 10 As a school we received no correspondence from the Environment Agency about this consultation. Is it not the EA's responsibility to inform all local residents about such a proposal?
- 11 Finally, and perhaps most importantly, why does the Site Condition Report describing what surrounds the site make no mention of Strong Close Nursery School? Surely this should have been included as a 'sensitive receptor'?

We look forward to your response.

Rosemary Humphrys (Vice Chair)

11.12.18