

Mr P Thomson  
Head of Law and Administration  
County Hall Chelmsford. Essex. CM1 1LX

Dear Mr Thomson

**Planning application ESS/37/08/BTE**

**Regional Waste Site and Incinerator, Rivenhall Airfield, Essex**

**I am writing to OBJECT to the above planning application.**

The plans are of regional significance, are controversial and are in breach of 22 Braintree District Local Plan policies, 1 “saved” Essex Structure Plan policy, 9 Essex Waste Plan policies, 8 policies of the East of England Plan and are in conflict with 9 PPS and PPG national planning policies. At 25.3 hectares, the site is over 4 times larger, and the proposed buildings 25 times larger, than stipulated for the site in the Essex Waste Plan.

The development is in the countryside as defined in the Braintree District Local Plan and is not “a brownfield site” as claimed. The site is largely woodland, grassland and arable land. The development would result in the loss of 11.5 hectares of Grade 3a agricultural land – the “best and most versatile”, the loss of, or damage to, the habitat of 5 EU/UK protected species (bats and newts), the loss of TPO trees and TPO woodland and the loss of the habitat of brown hares and 66 species of birds, many of them listed and Biodiversity Action Plan species.

The development would prejudice access to identified minerals reserves. The applicant has failed to provide detailed evidence of the climate change impacts of the proposal as required by Government policy. The plant would operate continuously, in breach of the Essex Waste Plan and would cause significant light and noise pollution in what is a very quiet and naturally dark part of the countryside at night. The proposal would lead to an increased demand for water from the ground and the nearby River Blackwater.

It is not acceptable that residents would be subjected to the noise, dust and fumes of up to 2 years of construction of the site, 7 days a week.

The 360,000 tonnes per annum waste incinerator is in breach of pledges made by Essex County Council that such a plant would not be developed in Essex. The developer claims that there would be “no unacceptable risks” to human health, wildlife or crops, but this must be independently tested. The incinerator would be emitting pollution continuously for approximately 25 years. The plant has the “potential to produce significant odours, bioaerosols, contaminated water and fugative emissions” as stated by the Environment Agency.

The description of a “recycling and composting centre (RCF)” is misleading. The proposal is not an “evolution” of the previous RCF scheme (ESS/38/06/BTE). The RCF cannot be taken as a justification for grant of consent on the current scheme – as Essex County Council have already made clear. The site would handle municipal, commercial and industrial wastes, including at least 331,000 tpa from outside Essex. The increased footprint, new elements of a 360,000 tpa regional

waste paper pulping plant and 360,000 tpa regional waste incinerator, plus the doubling of capacity overall make this proposal much more significant than the former RCF scheme. The former scheme was 510,000 tonnes per annum gross. The current is over a million tonnes per annum gross. Four planning conditions placed on the RCF scheme are breached by the current proposal – no incineration, no waste from outside Essex, a maximum of 510,000 tpa and no waste discharged outside buildings.

The application traffic figures are unreliable. The application proposal involves the movement of around 1.3 million tpa waste – around 50% more than the former RCF proposal, yet it is claimed the HGV movements would be exactly the same at 404 per day. The increased HGV traffic would use the private access road to cross two public roads including a Protected Lane, the Blackwater Special Landscape Area and would join the already over-capacity A120 at Bradwell. The Highways Agency has stated it would not allow a private access on to any new line of the A120 for safety reasons. Increased HGV traffic would also affect nearby villages.

The site is just 1km away from the model garden village of Silver End, about half of which has Conservation Area status. Part of the application site contains the listed buildings at Woodhouse Farm, the setting of which is directly threatened by the 35m high, 7m diameter incinerator stack and car and coach parking. A number of footpaths would be affected including F8 which passes very close to the proposed plant, not 300m away as stated in the application. The developer's wind direction data is unscientific and unreliable. Far from being a “worst case scenario”, on average, the wind would blow emissions towards Silver End for about 73 days a year and towards Cressing/Braintree 33 days, Bradwell/Pattiswick 40 days, Coggeshall 106 days, Feering 40 days, Kelvedon 51 days and Rivenhall/Witham about 22 days a year.

The developer has failed to justify “overriding need” or to demonstrate that this is the only site available or that the site needs to be so large. The site is much larger than needed to deal with North Essex waste and is in breach of the proximity principle. Essex is making good progress in recycling, and Braintree District residents are set to achieve 50% recycling 10 years ahead of the 2020 target. Genuinely green forms of waste management such as materials recycling and anaerobic digestion should be done at district level to minimise transportation.

**For all the above reasons I would respectfully request that the County Council REFUSE the application.**

Yours sincerely

Address

Dated