

To: Miss Janna Tweed
Government Office for the East of England (Go-East),
Planning Casework Team, Eastbrook, Shaftesbury Road, Cambridge. CB2 2DF

Dear Miss Tweed

Planning application ESS/37/08/BTE

Regional Waste Site and Incinerator, Rivenhall Airfield, Essex

I am writing to request that the above planning application be “called in” for a planning inquiry.

The application is of regional significance, is controversial and is 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 is in conflict with 9 PPS and PPG national planning policies.

The application site is 25.3 hectares - 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 and is not “a brownfield site” as claimed. There would be significant landscape impacts. 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 TPO trees and TPO woodland and the loss of habitat of 5 EU/UK protected species (bats and newts), brown hares and 66 species of birds, many being listed and BAP species.

The development could 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 proposal would lead to significant light and noise pollution in a very quiet and naturally dark part of the countryside. The proposal would lead to an increased demand for freshwater from the ground and the nearby River Blackwater.

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

The description of “the evolution of the recycling and composting centre (eRCF)” is misleading. The proposal is not an “evolution” of the previous scheme (the RCF) (ESS/38/06/BTE) and the RCF cannot be taken as a justification for grant of consent on the current scheme – as Essex County Council has already made clear by stating that the current proposal needs to be justified from baseline. 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 RCF scheme was 510,000 tpa gross. The current is over one 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, no more than 510,000 tpa and no waste discharged outside buildings.

The application traffic figures are unreliable. The current 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 will be exactly the same at 404 per day. The private access road would cross a Protected Lane, the Blackwater Special Landscape Area and would join the already over-capacity A120 at Bradwell. Increased HGV traffic could affect many 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 and structures 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 claimed by the developer.

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 as large as proposed. The capacity is many times larger than needed to deal with waste in the North Essex Area and is thus in breach of the proximity principle. Essex is demonstrating good progress in recycling, without the need for large centralised waste sites. The proposal directly threatens district based success in recycling.

There should be a public inquiry to properly investigate the application and it should not be left to Essex County Council to determine the application. The Council has already stated support for such large sites (Waste Strategy and PFI bid). The council also has an interest by virtue of being the waste disposal authority and the authority that would determine future waste contracts. Furthermore, the County Council has a “letter of understanding” with the applicant regarding an incinerator on the site. This amounts to an element of pre-determination.

Yours sincerely

Address

Dated