

## Rivenhall Airfield Major Waste Site and Incinerator

### **January 2009 NEW Briefing sheet on the additional information submitted by the developer following the Regulation 19 request from Essex County Council.**

The developer has had to submit additional information. This gives another opportunity to OBJECT to the application. If you have not yet written to Essex County Council, please do so as soon as possible. **THE DEADLINE IS WEDNESDAY JANUARY 21st.**

If you did write in last autumn, you can now write in again. Please also print this sheet off and give to family and friends or if you can, please print off enough to do your road or part of it. Over 600 people objected last autumn, lets keep the pressure up and get the number over the 1,000 mark.

**Please write today to object to the planning application.**

Quote reference number ESS/37/08/BTE ("Reg 19" information).

Write to: Philip Thomson Essex Legal Services, New Bridge House, 60-68 New London Road, Chelmsford CM2 0PD. Or by e-mail to [mineralsandwasteDC@essex.gov.uk](mailto:mineralsandwasteDC@essex.gov.uk)

Please also write to GO-East to call for a public inquiry to [janna.tweed@goeast.gsi.gov.uk](mailto:janna.tweed@goeast.gsi.gov.uk)

1. The new information shows that the loss of trees around the proposed waste complex is even greater than previously admitted. In places, just 20m of standing trees will be left. The original application said 30m. It appears that the developer previously significantly misrepresented the screening effect of the remaining trees by overstating their heights. The new tree survey he was required to undertake, conducted in November, shows that almost all the trees in the woodland areas are lower in height than previously claimed. Not only would the incinerator stack be more prominent, parts of the main buildings (and the AD tanks in particular) would be visible above and through the trees, especially when the leaves are down.

The new information reveals that more trees are to be removed from near the retaining wall around the waste complex and a further 5m strip coppiced. In addition, the developer says that no trees will be now be saved by being transplanted, as previously pledged. At each version of the plans since the original RCF, the remaining fragments of the woodland have reduced. The long term viability of the surviving trees would be seriously threatened by the proximity to the waste complex, the concrete walls and the drop in water levels.

2. The developer now admits in the new information that the 35m incinerator chimney stack will be clearly visible from the listed buildings at Woodhouse Farm. His previous drawings showing trees screening the stack were inaccurate. The developer states the car park at Woodhouse Farm will stay as previously planned, despite this being a concern raised by ECC Historic Buildings officers. The developer now says that one of the reasons he wants it there is for when the gravel operations move eastwards – but that is a separate planning matter.

3. There have been no changes to the lorry movements in the new information. The developer is still claiming he can move over 1.2 million tonnes of waste a year with 404 movements per day – exactly the same number as for the previous RCF scheme which had a much smaller capacity. However, there appears to be a significant increase in the amount of paper now being exported off site compared to the original application which does not fit with the traffic movement data. The access remains as before, off the congested A120 at Bradwell.

4. The "Combined Heat and Power Plant" claim has been shattered by the contents of the new information. The **majority** of electricity, and **all** of the heat generated will be used internally within the site. There will be no district heat benefit to any local homes and the amount of electricity to be exported to the national grid has now been reduced from 33 MW to 20.9 MW - **a fall of 37%** - and that is a measure of peak output, not typical output.

5. The developer is maintaining that a 35m x 7m stack is sufficient for the incinerator stack in order to meet emissions limits but the new information appears to be suggesting the gas engine flue stack may be made higher - which will again, increase the visual impacts. The new information still does not properly address the fact that all communities around the airfield will be exposed to the emissions to greatly varying degrees, depending on the daily weather conditions and wind direction.

6. The new information reiterates that the whole "need" basis for the development has been to meet the

“requirements” of Essex County Council and its Waste Strategy and Waste PFI bid. **Yet both the Leader and Chief Executive of ECC have written to residents over recent months stating that these were NOT to be used to judge the application and that planning policies should be used in determination.** There has been no new justification for the clear breach of policies involved in developing a site much larger than allocated in the Essex Waste Plan, with much larger buildings than stipulated. No new justification has been presented to override policies in terms of the loss of good quality agricultural land, woodland and other habitats, disturbance of protected and listed species, damage to a Protected Lane, impacts on several footpaths and on the Blackwater Special Landscape Area – in summary the impacts of a large industrial development in the countryside that would operate continuously day and night on a site NOT allocated for industrial development in the Braintree District Local Plan. Braintree District Council Planning Committee unanimously resolved to object to the application on numerous grounds in December. The Environment Agency has submitted a “holding objection” regarding surface water runoff.

Having claimed to have carefully matched the scheme to the ECC's "requirements" - and as we know the siting of an incinerator on the airfield has been the subject of discussions between ECC and the developers for several years - at this late stage, the developer has now announced that should he not get the ECC contract, he will develop the site **entirely for the treatment and disposal of commercial and industrial wastes !** This is a far cry from the “recycling and composting facility” for largely household waste which the developer all along has claimed he intends to build. Changing the waste inputs would undermine significant application details and the developer has not indicated how the traffic movements and processes, for example, would change if purely C&I waste were brought to the site. Whatever the inputs, no information has been provided by the developer on where he would send the outputs, despite being asked to do so by ECC.

7. The developer has responded to the fact that a large paper pulping plant is to start operations in Kings Lynn. He states that **if he cannot get the feedstock for his proposed paper pulping plant from within Eastern Region, it would “be a preferable option” to bring it in from London.** This would further increase the catchment for the waste site. These last minute significant changes underline that there can be no guarantee about the final nature of what is a commercially driven exercise.

8. The developer has not submitted a report on the climate change impacts of the whole development, as Government Guidance PPS1 strongly suggests he should do for a scheme of this size, which would be emitting hundreds of thousands of tonnes of CO<sub>2</sub> per year and involves long distance HGV movements.

### **What happens next**

We expect that ECC may determine the application within months. The dates for the next committee meetings are: the mornings of Friday 27th February and Friday 27th March at County Hall, Chelmsford. We would like to get as many local people there as possible to hold a peaceful demonstration on the steps of County Hall. Please pencil in these dates in your diary.

We have produced a sheet giving contact details of all the members of the ECC Development and Regulation Committee. Please do write to the councillors direct.

If despite the overwhelming opposition, ECC approve the application, we will have just a few weeks afterwards to write again to Go-East to ask for a public inquiry. We have prepared a petition to be circulated quickly to get THOUSANDS of people to sign in support of a public inquiry from all the villages around the airfield.

Although its great to see that some posters have gone up, please do consider putting more up and asking friends and neighbours to do so. When the inquiry into previous (turned down) waste plans on the airfield was held in the 1990s, the Inspector noted the large numbers of posters on display in the villages.

This document and all others mentioned are available electronically. (See contact details).

Thank you to the hundreds of people who are supporting the Stop the Incinerator campaign. To keep up the work there are costs, so if you can spare a donation, it would be much appreciated.

For further information (and printed and published by) please contact: Cllrs. James Abbott and Philip Hughes tel 01376 584576 e-mail [james\\_abbott@btinternet.com](mailto:james_abbott@btinternet.com)

Web updates and downloads: [www.bugleonline.co.uk](http://www.bugleonline.co.uk) National web update on incinerators: [www.ukwin.org.uk](http://www.ukwin.org.uk)