

# Rivenhall Airfield Regional Waste Site and Incinerator

*Planning Application Consultation Period lasts until 29<sup>th</sup> October 2008 - Please OBJECT now to the application and please ask for a PUBLIC INQUIRY.*

The Planning Application for a Regional Waste Site and Incinerator at Rivenhall Airfield has been submitted - and the clock is ticking on the opportunity to make representations.

The application documents are very extensive and will take some time to go through. This note is the second interim advice on the application details and how to make representations.

There will be a full newsletter distribution soon to all the communities around the airfield with more details of the application and guidance notes on how to object. There will also be a series of public meetings which will be the subject of separate notification as the Parish Councils are organising many of these.

To defeat the plans, the campaign needs the support of councillors of all parties, parish councils, local organisations, schools, churches and residents - a campaign that reaches right across the community.

Please write NOW to object to the application, even if you intend a fuller submission later. And please also write to Go-East to ask for a public inquiry - a repeat of the 2007 vote on the previous plans is not acceptable - when a handful of Essex County Councillors, none of whom represent this area, or even this district, rubberstamped the proposals and only one person was allowed to speak against the plans from this area.

## **Please send your objections by post to**

Mr P Thomson  
Head of Law and Administration  
County Hall Chelmsford. Essex. CM1 1LX  
Or by e-mail to [mineralsandwasteDC@essex.gov.uk](mailto:mineralsandwasteDC@essex.gov.uk)

## **Please also request a public inquiry - write to**

Miss Janna Tweed  
Government Office for the East of England (Go-East), Planning Casework Team  
Eastbrook, Shaftesbury Road, Cambridge. CB2 2DF  
Or by e-mail to [janna.tweed@goeast.gsi.gov.uk](mailto:janna.tweed@goeast.gsi.gov.uk)

## **Please quote application number ESS/37/08/BTE.**

**Some key points to send to Go-East:** The plans are of regional significance, are controversial and are in breach of numerous Local Plan and national policies. The development would result in the loss of 11.5 hectares of Grade 3a agricultural land – the “best and most versatile”. This is contrary to national policy. The incinerator element is in breach of public pledges made by Essex County Council that such a plant would not be developed in Essex. The new elements of a waste paper pulping plant and waste incinerator, plus the doubling of capacity overall make this proposal much larger and more significant than the 2007 scheme (now over a million tonnes per annum (TPA)). 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 by virtue of their expressed support for such large sites (Waste Strategy and PFI bid) and their letter of understanding with the applicant regarding an incinerator on the site. This amounts to an element of pre-determination.

## **Some key points to send to Essex County Council:** The above, plus:

The application is in breach of numerous policies in the Essex Waste Plan including the site WM1 and policy W8a by virtue of the application site being over 4 times larger than that allocated in the Plan and the buildings being some 25 times larger than stipulated in the Plan. The application is in breach of numerous policies in the Braintree District Local Plan, particularly countryside policies and use of land in rural areas. The site is not “brownfield land” as claimed by the developers, but is countryside (RLP 78), as shown in the Plan. The proposal is contrary to the

proximity principle by virtue of being a regional waste site. The proposal is in breach of the Essex Waste Strategy by virtue of being much larger than necessary to meet the requirements of the County Council and by being a site significantly geared towards importing wastes from outside Essex (at least 331,000 tpa).

The description of the development by the developers masks the actual reality of what is proposed and several of the key elements of the plans are not properly described in their public distribution summary documents, but are revealed deep within the plans. The application is described to the public as “the evolution of the recycling and composting facility (eRCF) by the developers. In reality the change is to include a regional 360,000 tpa commercial and industrial paper pulping facility, a 360,000 tonne per annum waste incinerator and overall, to about double the capacity of the site compared to the 2007 version. The scheme has increased by 160,000 tpa even since the exhibition in June of this year. These are not “minor” changes and the scheme bears no resemblance to the one which Essex County Council resolved to grant consent for in March 2007. In any case, the developers have not to date signed the legal agreements on the 2007 scheme (and so it is not currently deliverable) and state in the current application that “the RCF (2007 scheme) no longer represents the most suitable technologies for the future waste contract ... neither does it ... meet the requirements of the County Council”. This strongly suggests the developers have no intention of building the 2007 scheme and that the current application is what they really want to build. The 2007 scheme cannot be taken as a justification for allowing the current proposal by default, as the developers appear to claim.

The plan is in breach of the Essex Waste Plan - the application site is many times larger than that allocated in the Plan which stated that the buildings should be “comparable in scale to the current buildings” (the old WWII hanger). This policy was decided by an Inspector after a democratic public inquiry who said the site should be limited because it is in the countryside. The proposed buildings are actually 25 times larger than the current buildings and will be hundreds of metres in length.

The private road access is totally inadequate - cutting across local lanes and on to the A120 at Bradwell, which is already above capacity. The development would generate many hundreds of extra HGVs per day - and the developer's claims that these HGV movements (404 per day) will be no more than their 2007 scheme is highly dubious given the doubling of the site capacity and the need to import and export large volumes of material on and off site. The lorries could access the A120 at Bradwell along any local road that does not have a weight restriction - ie through Witham, Rivenhall, Silver End, Cressing, Kelvedon and Feering. Household waste would be imported from across the northern half of Essex and paper wastes from across Eastern Region. Nearly 90,000 tonnes of processed waste would be trucked from the second Essex plant, probably Basildon, to be burnt at Rivenhall. Wastes would also have to be exported back off site, including incinerator ash. The developers admit that the scheme would be “entirely reliant” on road transport. In addition, further development of the site would be highly likely given the history of major waste sites. The developers themselves talk of “future upgrades”. This would be a privately run waste site and contracts, and hence sources of waste, could be from virtually anywhere.

The incinerator will emit gaseous and particulate pollution, which local people, wildlife and crops will be exposed to. Yet when the 2007 application was decided BOTH the developers and County Council stated categorically that there would be no waste burning/incineration on the site. The developers state that emissions will include oxides of nitrogen, oxides of sulphur, carbon monoxide, PM10 particulates, hydrogen chloride, dioxins, furans, other gases and a host of heavy metals including antimony, arsenic, cadmium, cobalt, copper, chromium, lead, manganese, mercury, nickel, thallium and vanadium. The developers claim that there would be no risks to human health from the 360,000 tpa incinerator (which would operate 24/7), burning processed household, commercial and industrial wastes. This claim must be tested at a public inquiry under expert scrutiny. In reality, there will be pollution and the concentration of it and direction it moves will be dependent on what is being burnt at the time, weather conditions and wind direction. This could make concentrations very variable. In addition, many of the pollutants are bio-accumulative and will build up in soils in particular. The proposed visitor centre, which the developer states children would be encouraged to visit, is immediately downwind of the chimney with the prevailing wind (SW) blowing. There have been numerous studies worldwide of the health impacts of living in the vicinity of waste incinerators, many of which reveal there are impacts, particularly to children. The developers describe the incidence of the wind blowing towards Silver End, the closest community, as “a worst case scenario”. Quite what they mean by this is unknown. It is a fact that the wind blows towards Silver End from the proposed incinerator site (an easterly) for a significant proportion of the year. Indeed throughout the recent 2 day (September 2008) exhibition of the plans at the airfield, the wind was blowing from the E or NE. There are several primary schools within a few miles of the site, located at

various points of the compass, which would be downwind of the chimney depending on the wind direction on any particular day.

The developers claim the chimney would be 35m high and 7m in diameter. Advice from the Environment Agency, Essex County Council's consultants and experience of other schemes around Europe suggests a much higher chimney would need to be built, and at least 45m. This would be visible over long distances and this area would become known for its waste plant chimney, hardly an encouragement to people living, working or visiting here.

The potential, or actual development of the waste site would appear on land searches for people wanting to buy property in the area.

The site is an identified wildlife habitat for protected and listed species and includes large areas of protected woodland which will be destroyed if the scheme went ahead. Identified species include many types of birds (including buzzards, skylarks and owls), at least 3 species of bat, brown hares, Great Crested Newts and deer. Several acres of the protected woodland would be destroyed by the scheme, as well as grassland and farmland. Several public footpaths would be affected.

The waste site would be security fenced and security lit, operating 24/7. The site is currently a naturally dark area of quiet countryside at night where wildlife flourishes and people can walk along the footpaths during the day. That would all change. The proposal would be a significant intrusion in the rural landscape and there would be light pollution in what is one of the last areas of mid-Essex where the Milky Way can still be clearly seen.

The construction period would last up to 2 years and would be 7 days a week.

The plant would require an additional 121 tonnes of water a day, which could come from the local piped supply or the River Blackwater. Essex is the driest county in the UK and already has to import around 50% of its supply from outside Essex.

The proposal is also a DIRECT THREAT to further progress in recycling and waste minimisation - this huge waste site will DEMAND large quantities of waste to process and burn - locking Essex into unsustainable ways of dealing with waste into the 2030s - the contract period for the Essex Waste Strategy and PFI scheme.

The viable and sustainable alternative is for waste to be treated largely within the districts it originates, on existing industrial areas using recycling, composting and anaerobic digestion for food waste. There should be no waste burning, which just destroys valuable resources and causes pollution. Braintree District is already achieving nearly 50% recycling and composting – which is 12 years ahead of the Essex 2020 target. There is simply no need for this massive waste site in this district, importing over 95% of its waste from outside the district, and all of it by road.

For further information please contact:

Cllrs. James Abbott and Philip Hughes

tel 01376 584576

e-mail [james\\_abbott@btinternet.com](mailto:james_abbott@btinternet.com)

website updates [www.bugleonline.co.uk](http://www.bugleonline.co.uk)