

STOP THE INCINERATOR

OCTOBER 2009 NEW Briefing sheet on the additional information submitted by the developer to the PUBLIC INQUIRY which is being held from 29th September to 16th October.

The developer has had to submit (yet more) additional information. This gives another opportunity to OBJECT to the application. The deadline is 14th October 2009.

Please write today to object to the latest version of the planning application.

Quote reference APP/Z1585/V/09/2104804

Write to: Ms Sian Evans, The Planning Inspectorate
Room 4/04 Kite Wing
Temple Quay House, 2 The Square, Temple Quay. Bristol BS1 6PN

or by e-mail to: sian.evans@pins.gsi.gov.uk

The new information is contained in an “**Addendum to the Environmental Statement**” and is in 4 chapters:
- **air quality, human health risk, carbon balance and ecology.**

Although Statutory Consultees will have been written to about this new information, we understand that most of the 800 plus objectors will not have not been notified directly.

The following points are suggested as grounds for OBJECTING to this new version of the application:

1. The Addendum to the Environmental Statement (AES) has been published very late, just before the Planning Inquiry, giving very little time for responses.
2. Most of the 800 plus people and groups who objected to the application have not been informed directly of the new information, and it has been left to local community groups to circulate details.
3. The applicant has produced, on 28th September 2009, a 45 page erratum document to the AES. No notice appears to have been given to the vast majority (800 plus) of those concerned about the waste plant regarding these errors in the AES. Given that 45 pages of information in the document is incorrect, it should be reissued for a new public consultation giving adequate time for everyone to respond. For example, the table at page 1 of the Discrete Receptor Tables Scenario 1 is clearly incorrect, with the wrong PEC figures for NO₂.
5. The Chapter on Air Quality still does not make it clear how high the main incinerator stack will be nor how many stacks in total there will be. It is unacceptable that this is uncertain given the clear need to assess in planning terms the impact on the local landscape of the chimney.
6. In the AES, the applicant discusses the possibility of a 40 m high main incinerator stack to try to keep emissions of Arsenic to within legal limits. This would be 5m higher than the stack height that the applicant previously stated was as high as he would need to go (such as stated in the Regulation 19 response).
7. The emissions of a number of pollutants, including Arsenic and Lead are close to legal limits. It is unacceptable for local people to be exposed to pollution anywhere near legal limits. The 1 hour maximum Lead concentrations at Footpath 8 and 35 and at Bumby Hall/The Lodge/The Polish Camp are close to legal limits as shown in Table 2 of Scenario 3. For this modelling, Lead levels could rise by up to 5 times more than background levels. But there is also uncertainty as to the correct figures because of the 45 pages of errors.
8. The applicant has failed to ensure that ground level emissions at the site boundary or beyond will be monitored if the plant is built. There is therefore no way of knowing if the theoretical models being used are accurate.

9. The applicant has failed to take into account that some of the highest levels of emissions would be at and near the listed Woodhouse Farm. This is the proposed offices and visitor centre. The well used public footpath 8 approaches and then passes through the grounds of Woodhouse Farm. It is unacceptable that people should be exposed to such pollution, whether they be walkers, school children at the visitor centre or staff.

10. The applicant has failed to carry out an assessment of pollution from the hundreds of extra HGVs that the site will generate. The applicant has assumed that the HGVs turn East or West on to the A120 in roughly equal proportions. If that assumption is wrong, and 63% turned West through the village of Bradwell, an air quality assessment would be needed. It is entirely possible that 63% or more of HGVs could turn West.

11. At this late stage, the applicant is proposing yet more alternative designs to the exhaust stacks. The number and heights of the stacks is still uncertain. A competent applicant would have known from the outset what the Best Available Technology (BAT) would be. By repeatedly changing the design, the applicant is not demonstrating competence. In addition, an Environmental Permit application has not been made to the Environment Agency. This is contrary to Government Guidance in PPS 10. The lack of certainty about the development is also contrary to Government advice.

12. On page 3 of appendix 2-1, it states that the development would “export 40 MW of electricity to the national grid”. This is a completely false claim. The Regulation 19 response from the applicant in December 2008 stated it would only be about 20MW and the most recent assessment agreed at the Inquiry is less than 15MW.

13. Despite repeatedly being told of their error, the applicant at page 7 of Appendix 2-1 repeats the false statement that “the closest footpath lies approximately 300 m to the south (Footpath 8). It does not. Footpath 8 passes very close to the site of the waste plant, and within a few tens of metres of the site boundary.

14. The applicants appear to assume that all the material being burnt in the incinerator will be Solid Recovered Fuel SRF). If this is an assumption in their modelling, it could be flawed. The incinerator is proposed to burn up to 165,000 tonnes per annum of waste paper sludge (up to 46% of the paper they state is to be brought to the site to be recycled), and other materials, as well as SRF.

15. The emissions modelling does not appear to have taken into account the full extent of the proposed waste site buildings (page 24 and page 65 of Appendix 2-1), nor the future growth of the proposed new woodland, which will increasingly cause turbulence as it grows higher.

16. Some of the “scenarios” for the stacks in the emissions modelling produce large numbers of plume groundings. The applicant appears to have taken no account of the direct affect this could have on people or animals each time this occurs. People would be directly exposed to the emissions, particularly at close range such as at Woodhouse Farm or on Footpath 8.

17. In the Chapter on Carbon Balance, the modelling has taken no account of how recycling and composting would improve without the “eRCF” at Rivenhall Airfield being built. The model assumes no progress beyond the level of recycling currently reached. This is totally unrealistic given the significant improvements year on year being achieved by residents in Essex. The reduction of waste to landfill has been 25% in 5 years and recycling and composting reached 43% in 2008/9.

18. The carbon emissions from the HGV movements of waste do not appear to have taken account of the proposal at The Inquiry from the applicant that he intends widening still further the site catchment for waste to The East Midlands and South East Regions.

The Community Group has been formed to represent local communities, organisations and residents at The Inquiry. The Stop the Incinerator Campaign is part of the Community Group. For updates on the campaign and the Inquiry please visit: www.stoptheincinerator.org
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