

Rivenhall Parish Council

*SERVING THE COMMUNITIES OF RIVENHALL AND RIVENHALL END IN THE BRAINTREE DISTRICT
IN THE COUNTY OF ESSEX*

CLERK TO THE PARISH COUNCIL

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Your Ref: WDD/PA/11/PTCsite

The Head of Environmental Planning, WDD
Essex County Council
County Hall
Chelmsford
CM1 1XZ

Dear Sir/Madam,

Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document - Preferred Approach (November 2011)

Please find detailed below the response of Rivenhall Parish Council relative to the document mentioned above. The Parish Council has not suggested answers to all the questions, just those they felt were most important to the parish and these obviously mainly relate to Rivenhall Airfield.

Question 1. Do you agree with the key issues set out in the Capacity Gap Report?

Answer. No.

Regarding Point 1 - The assumption that Municipal Solid Waste (MSW) and Commercial and Industrial Waste (C&I) both remain essentially constant until 2030 is highly unreliable. Recent data shows significant falls in both. Essex County Council says that this 'may' be due to the recession, but there is no evidence given as to whether that trend will continue or not. Essex County Council has been consistently pessimistic, for over a decade, as the various waste plans, strategies, etc have been drawn up as to the ability of Essex to reduce waste and recycle more. Essex County Council should be commissioning independent realistic projections based on good data, taking into account recent encouraging reductions in arisings and strong performance in recycling.

Regarding Point 7 - There is an over-reliance on the three proposed major sites at Basildon, Stanway and Rivenhall. The Plan says that Essex County Council needs all the three major sites

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to deal with MSW waste, yet Essex County Council has just awarded the MSW contract to Basildon. Capacity figures show big surpluses in the waste categories these plants would deal with out to 2031, the end of the Plan period. There is no analysis of how the figures would look if one major site dropped out, so it has not been shown that all three are 'essential'. The reliance on the three major sites is an over-centralised approach whereas we need a more flexible approach, and it is also contrary to the proximity principle. Burning 360,000 tpa of waste at the proposed Rivenhall plant - to power itself - is unsustainable. Rivenhall, as Essex County Council knows but has not made clear in the Plan, is reliant on importing waste from outside Essex.

Question 7. Do you agree with Preferred Approach 3, and the Overall Spatial Strategy as shown on Map 27?

Answer. No.

The approach is far too reliant on the proposed three major sites, as already stated above. A more decentralised approach is needed - indeed, one that is already working in Essex, a county which has made huge strides in the last decade or so based on smaller sites, i.e. without the three major sites. We need to encourage more facilities of all types of sustainable waste management close to arisings - on existing industrial areas near all significant centres of population, not just the growth areas that Essex County Council has identified. *Essex County Council has failed to carry out site assessments for the proposed three major sites as has been done for the other sites*; they state that this is because the three major sites have planning consent - but so do some of the preferred sites including W7 and W9. So the Plan is not based on a 'level playing field'.

Question 8. Do you agree with Preferred Approach 4 [SAFEGUARDING AND WASTE CONSULTATION ZONES]?

Answer. No.

It has not been shown that the three major sites are all 'essential' to the Plan. There is very significant capacity headroom in the types of waste these plants would deal with and it is inevitable that sites not yet identified will come forward. The three major sites are 'essential' to Essex County Council because that has been, for many years, Essex County Council's aim, linked to the PFI process. All the sites should be looked at on a 'level playing field' basis.

Question 9. Do you agree with Preferred Approach 5 and the sites suggested for allocation? (Site specific responses should be made in Appendix E).

Answer. No.

As already stated, the three major sites should have been properly assessed using the same criteria as the other sites have been judged against.

Question 13. Do you agree with the Preferred Approach 14 [LOCATIONAL CRITERIA (including MBT)]?

Answer. No.

Essex County Council appears to be saying that **any** proposals that undermine the three major sites would not be allowed on new sites. Surely that is anti-competition?

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MBT is not a sustainable method as it merely delays and slightly reduces disposal. Centralised large MBT sites on long term contracts may lock Essex into landfill/incineration and could lead to commercial pressure to cap recycling rates. Local residents are generally very keen recyclers and rates continue to rise. Braintree District expects to recycle/compost/ 60% of MSW soon. The public has also demonstrated very clearly, both through previous waste consultations and specifically in regard to the eRCF planning application, that they reject waste incineration.

Question 14. Do you agree with Preferred Approach 15 [LOCATIONAL CRITERIA (including incineration)]?

Answer. No.

Essex should not be advocating any form of major waste incineration process due to emissions and destruction of resources. As given in evidence at the Rivenhall Airfield eRCF Planning Inquiry in 2009, the proposed incinerator will lower air quality for local people in the villages around the airfield. Paragraph 5.48 includes serious errors of fact regarding waste incineration (points raised in **bold**) that should be corrected at the next stage of the WDD:

5.48: The energy from waste process involves burning of waste material at high temperatures, directly releasing the energy contained within the waste. Where waste is to be burnt, **(SOME OF)** the energy released is captured and used to provide a renewable energy source **(NO - ONLY THE BIOMASS ELEMENT IS RENEWABLE)** (heat or power) to help reduce carbon emissions **(NO - BURNING NON-BIOMASS CAN ADD TO GREENHOUSE GAS EMISSIONS - ESPECIALLY PLASTICS)** and can positively contribute to alternative energy sources (coal power stations). Energy from waste is distinctly different from mass burn incineration, which incinerates waste for its own sake and does not recover any energy value, be it heat or power. Incineration/mass burn incineration is below both energy recovery and landfill disposal in the waste hierarchy and does not contribute to reducing climate change, it has not,, therefore, been pursued as an option for the WDD. **(THIS IS WRONG - ESSEX COUNTY COUNCIL HAS INCLUDED INCINERATION IN THE PLAN - THE RIVENHALL PROPOSAL INCLUDES A 360.000tpa INCINERATOR WHICH WILL BURN WASTE, PAERT OF WHICH COULD BE RECYCLED. THAT ELEMENT IS DISPOSAL).**

Question 21. Do you agree with the Preferred Approach 22 [TRANSPORT]?

Answer. Yes.

These are reasonable criteria, however, Essex County Council has not applied this approach to the Rivenhall proposals. If either permitted plant is built, it will add to the hell that residents already suffer by increasing HGV traffic on the (over capacity) A120 at Bradwell by about 30%. There is also serious risk of displacement on to local roads through Rivenhall and Silver End (and Kelvedon) in the event that the a120 becomes blocked.

Question 22. Do you agree with the Preferred Approach 23 [WASTE MANAGEMENT DEVELOPMENT PROPOSALS]?

Answer. Yes.

These are a reasonably good set of criteria for judging waste development proposals.

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Question 23. Do you agree with the suggested Site Selection Criteria?

Answer. No.

The site selection criteria should have been used for all sites, including the proposed three major sites. The proximity to key centres of growth should be replaced with one of population within a given radius. The current criteria gives undue weight based on proximity to only a few towns in the county.

Appendix E Preferred Sites and Non-Selected Sites.

Question 2.

Please select the site against which you would like to comment - **IWMF2 Rivenhall.**

Do you agree with the selection of that site?

Answer. No.

Essex County Council has selected Rivenhall on the basis that Essex County Council wants it in the Plan, not on the objective assessments used for other sites. Saying, as Essex County Council does in many places in the documents, that, because it has planning consent it does not need assessing contradicts the fact that other sites (W7 at Sandon and W9 Great Dunmow) also have waste related consents relevant to the intended Plan use yet **HAVE** been assessed. Essex County Council has consistently bypassed its own policies (i.e. Essex Waste Plan) in supporting Rivenhall and appears to be doing so again through this WDD process:

Appendix A states that the (previous stage of the Plan) issues and options consultation responses showed that industrial areas were preferred for 'energy from waste', as were sites close to arisings. Sites in the open countryside were not supported. Essex County Council states that 'these locations have been omitted from the Preferred Approach'. But they clearly have not - Essex County Council is once again supporting Rivenhall in every way possible despite it being in open countryside and nowhere near any industry.

These then are the observations from Rivenhall Parish Council, and I would be pleased if you will confirm their receipt in due course.

Yours truly,

Keith P. Taylor
Clerk to Rivenhall Parish Council.