

# Rivenhall Parish Council

*SERVING THE COMMUNITY OF RIVENHALL IN THE BRAINTREE DISTRICT IN THE COUNTY OF ESSEX*  
**CLERK TO THE PARISH COUNCIL**

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1<sup>st</sup> December 2010.

Essex County Council  
Via email

## **Waste Development Document October 2010 Issues & Options**

Below is the consultation response of Rivenhall Parish Council. I apologise for the delay in sending this response although it is just within the deadline date of 2<sup>nd</sup> December 2010.

I would appreciate your acknowledgement of the receipt of this document, either by letter or email to the address at the head of this letter.

Yours sincerely

Signed: Keith P. Taylor  
Clerk to the Council.

## **Consultation Response...**

### **Question 1**

#### **Prevention & Re-use.**

More should be done to require retailers to cut out unnecessary packaging and move to recyclable/biodegradable packaging.

The WDD should put more emphasis on waste avoidance rather than relying on expensive major infrastructure such as the proposed Major Waste Site at Rivenhall Airfield, which is very close to Rivenhall Village.

### **Question 2**

#### **Proposed Spatial Strategy (RSS) Evidence Base.**

No - The RSS evidence base cannot be relied on to 2013. Trajectories used in Essex within the last decade have proved inaccurate, let alone over 2 decades ECC was expecting up to 3% annual MSW growth arisings - this did not occur.

The strategy should be flexible and not reliant on large catchment Major Waste Sites such as Rivenhall Airfield, close to Rivenhall Village. A more decentralised network of sites is needed with district scale processing plants.

### **Question 3**

#### **Self-sufficiency.**

No - The target should be actual self-sufficiency for Essex, not net self-sufficiency. The RSS projections cannot be relied upon, particularly in the advanced stages of the Plan period. The Rivenhall Airfield site would import waste from a wide area beyond Essex, breaching the self-sufficiency principle.

### **Question 4**

#### **Self-sufficiency and London waste.**

Yes. The target should be actual self-sufficiency, not net self-sufficiency. The targets for reducing London imports by 2031 are agreed, but note this is contrary to ECC's support which was for the Rivenhall Airfield "eRCF2 development which relies on large scale importation of C&I waste from London and elsewhere outside Essex.

### **Question 5**

#### **Strategy Options.**

Option (b) should be used - Best Case Submitted RSS. The WDD should be more optimistic about the development of waste minimisation and more local innovative solutions over the Plan Period because experience shows that trajectories, even within the last decade have been pessimistic. Braintree District is already approaching the 60% target for recycling and composting of household waste - which was set for 2020 - so nearly 10 years ahead of target.

### **Question 6**

#### **Key Capacity Issues.**

1. Disagree - municipal waste arisings will fall, as stated in the WDD at para. 4.11
2. Agree - a move away from landfill is important and should be led by prevention of waste.
3. Agree - more transfer stations to reduce transportation.
4. Agree - more biowaste treatment - AD serving local area.
5. There is uncertainty over figures for Construction and Demolition Waste, so this forecast is not reliable.
6. Disagree - the Rivenhall Airfield proposal does not move treatment up the hierarchy. The "eRCF" proposal at Rivenhall Airfield includes 360,000 tpa of waste incineration, the lowest level of the hierarchy. The paper pulp facility will import waste from outside Essex. The MBT at the Rivenhall site could be used for merely reducing the volume of waste prior to incineration and/or landfill - this is not sustainable. Avoiding mixing and contamination, increasing recycling and composting and increasing reduction all reduces the need for MBT.
7. Disagree - there is the need for landfill for inert waste and Rivenhall Parish Council will oppose any proposals to open landfill space in the gravel pits on Rivenhall Airfield as an "extension" to the eRCF.
8. Disagree - on the scale of extra landfill needed. Extra capacity should be the minimum expected.
9. agree - on the need for specialist hazardous waste facilities, but these need not be in Essex due to the low volumes involved.
10. Agree - the call for sites increases the flexibility of the WDD. District scale facilities should be promoted that deal with waste as locally as possible.

### **Question 7**

#### **Consultation Questions.**

Yes to some, no to others.

- Issue 1. Agree - the need to take into account population densities is correct, which is why the Rivenhall site is unsuitable - it is by far the largest capacity of any approved site in Essex, yet it is in a rural area.
- Issue 2. Agree - the plan needs to take account of future development, but projecting housing growth over 2 decades is difficult.
- Issue 3. Agree - sustainable waste management is important in securing jobs. But this can be done in the most sustainable way by promoting district scale solutions. Centralised Major Waste Sites such as planned for Rivenhall Airfield will be probably run by multi-national corporations.
- Issue 4. Agree - waste management can have climate change benefits in reducing emissions. The WDD should though identify exactly how this is to be done. The Rivenhall Airfield proposal was presented at application stage with claims about electricity generation and climate change benefits which proved very optimistic when tested at the Public Inquiry. In addition, claimed climate change benefits of energy from waste need to be projected to future years when residual waste will have a higher proportion of non-bio waste and so a higher fraction of non-renewable energy.  
 Agree - that waste should be treated as a resource, which is why incineration should not be used.  
 Agree - that facilities should factor in climate change adaption, which is why the Rivenhall Airfield site is unsuitable due to its reliance on importing water from the mains or from the River Blackwater.
- Issue 5. Agree - transport impacts need to be minimised, which is why the Rivenhall Airfield proposal is unsustainable. It has a multi-regional catchment and would increase HGV movements along the already congested A12, which passes through Rivenhall Parish  
 Rivenhall and Rivenhall End, and other local communities, would be expected to police the routing agreement for the Airfield waste site and, due to its location, Rivenhall and Rivenhall End could well see off-route HGVs coming through the villages when blockages of the A12 (which occur regularly) take place.  
 Transport impacts can be reduced by developing smaller sites close to waste arisings - such as on the industrial estates within towns.
- Issue 6. Agree - waste management facilities need to minimise water demands. Essex is already a net imported of water. So why did Essex County Council support the Rivenhall Airfield application at the Public Inquiry? The plant would place an additional demand for fresh water of 121 tonnes per day and would depress the local water table.
- Issue 7. Agree - facilities should avoid damage to ecological interests.
- Issue 8. Agree - waste facilities need to be sensitive to landscape. So why did Essex County Council support the Rivenhall Airfield application at the Public Inquiry? The site is in the open countryside and will result in the loss of established woodland.
- Issue 9. Agree - facilities need to avoid impacts upon human health, amenity and air pollution. On air pollution, Essex County Council supported the Rivenhall Airfield proposal at the Public Inquiry, yet this plant, if it is ever built, will increase air pollution for residents in Rivenhall, particularly when the wind is from a northerly quarter.

#### **Key issues and Strategic Objectives.**

Disagree with SO4.

Rivenhall Airfield should not be safeguarded as a waste site. The site is not a sustainable location and the plant is contrary to many of the criteria in the WDD.

Disagree with SO9.

The Rivenhall Airfield proposal involves incinerating 360,000 tpa of waste. The WDD should be more explicit that if it supports Rivenhall Airfield, then it supports waste incineration, as defined by the EU Waste Incineration Directive.

#### **Question 9**

##### **Spatial Options.**

Option 'c' is supported because it places less reliance on larger centralised sites and opens the door to a more innovative and flexible approach, treating waste closer to where it arises.

#### **Question 16**

##### **MBT Facilities.**

These should only be sited in existing industrial areas and there should be a presumption against increased reliance on MBT. The proposed Rivenhall Airfield site has a heavy reliance on incineration of MBT residues from both within its own MBT and from the proposed Basildon MBT, totalling around 200,00 tpa.

#### **Question 18**

##### **"Energy from Waste".**

Essex County Council has changed descriptions of burning waste from incineration to "energy from waste". But what is proposed at Rivenhall is incineration of solid wastes, including non-bio wastes that cannot be classed as a source of renewable energy.

Paragraph 5.46 is factually incorrect in describing burning waste with energy recovery as a renewable form of energy that reduces carbon emissions. Burning plastics and other non-bio wastes is not classed as a renewable form of energy, yet Essex County Council continues to use such "green" terminology. Claiming climate change benefits would require a calculation taking into account transportation, types of waste to be burnt, type of waste plant, baseline and future waste streams, etc. It is not viable to state that "energy from waste" in itself reduces climate change impacts.

#### **Question 19**

##### **Gasification and Pyrolysis.**

As for question 18, this is another form of incineration and should not be promoted on any sites.

#### **Question 20**

##### **Landfill.**

The amount of waste going to landfill needs to be steadily cut by reduction, re-use and recycling. Rivenhall Parish Council will oppose any proposal for a landfill site at Rivenhall Airfield as an "extension" to the Major Waste Site.

#### **Question 21**

Strategic Sites in the WDD should be defined at 50,000 tpa, in-line with the original Waste Local Plan. Site locations should be as close as possible to existing sources.

In granting consent and in supporting Rivenhall Airfield at the Public Inquiry, Essex County Council has not been applying its own Adopted Policy. The proposed eRCF on Rivenhall Airfield has an input of over 800,000 tpa (more than 16 times the 50,000 tpa threshold) on a 26 hectare site - more than 8 times the threshold site size of 3 hectares suggested in the WDD.

**Question 22****Safeguarding existing sites.**

This approach is supported except for the Rivenhall Airfield site which is contrary to many of the stated aims of the WDD policies.

**Question 23****Safeguarding Options.**

Option A is supported, which requires safeguarding of sites only on the basis that they are supported by WDD policies. This must, therefore, rule out safeguarding the Rivenhall Airfield site.

**Question 24****Climate Change Criteria.**

Yes, these criteria are supported but there needs to be a calculation of climate change impacts for any proposed site, not just a vague claim. A site needs to demonstrate that it can actually reduce emissions, against baseline and projected waste arisings.

**Question 25****Transport.**

Yes, these criteria are generally supported. But the criteria should also include avoiding adding to already congested routes, such as the A12.

**Question 26****Re-Processing.**

No, these criteria are not supported. The WDD should aim for actual self-sufficiency, not net self-sufficiency.

**Question 28****Hazardous Wastes.**

The 3<sup>rd</sup> criterion is accepted - given the relatively limited volumes of this waste it could be more sustainable to transport out of Plan Area rather than develop a new landfill facility in Essex. Any proposed new landfill at Rivenhall Airfield will be opposed.

**Question 29****Radioactive Waste.**

No radioactive wastes should be landfilled in Essex. This could lead to pressure to open them up to higher level wastes and could encourage imports into Essex. Rivenhall Parish Council will oppose any landfill proposed for the gravel pits on the Rivenhall Airfield as an "extension" to the approved Major Waste Site.

**Question 30****Waste Consultation Zones.**

Option "C" is supported. Local planning authorities should consider if Zones are required around sites. There is also a need for the waste planning process to take more account of local views of all the Parish Councils in an area.

**Question 31****Health Impact Assessments.**

E - other option - insert "where any adverse impacts on human health are likely to occur". This should include assessments for all potential impacts including air pollution, dust, odours, noise, microbiological contamination, vibration and light disturbance.

**Question 32****Location and Design.**

These criteria are agreed but the last one should include "and avoid any adverse impacts to local amenity in terms of noise, smoke, dust or light pollution" (ie Statutory Nuisances).

**Question 33**

The last criteria should be deleted. This is a "get out clause" - as was used for the consent for Rivenhall Airfield, which allows "mitigation" even when Protected and BAP Species, Country Wildlife Sites and TPO Woodlands will be significantly harmed. Waste sites should not be allowed to cause such damage.

**Question 35**

The *General Consideration* criteria are supported except there should be a specific assessment of impacts on wildlife and habitats - not just a restoration criteria.

**Question 36****Waste Infrastructure Levy.**

No - any levy from housing developments should go towards local benefits such as improving kerbside recycling schemes. A levy funding waste infrastructure development could mean monies being used by private developers who should be building the facility out of their own finances.

**Question 37****Key Developer Provided Infrastructure.**

As identified in para 8.11.

**Question 38****Agencies to be involved.**

No - the list should include Parish Councils.

**Question 39****Other issues.**

The WDD should set out the current position with regard to recycling performance in local authority areas.

A number of local authorities in Essex are already close to the Essex County Council 2020 "aspirational<sup>2</sup> target of 60% recycling and composting; are well ahead of the EU target of 50% by 2020 and also well on target to meet the RSS target of 65% by 2031. For example the most recent Quarterly Performance Indicator for recycling and composting in Braintree District is above 56%.