Allerton Waste Recovery Park

SOME OBJECTIONS TO AMEY CESPA PROPOSAL

10 December 2011

North Yorkshire Waste Action Group
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Shaun Robson,
Planning Services,
Business and Environmental Services Directorate,
County Hall,
Northallerton DL7 8AH

Allerton Waste Recovery Park (AWRP)
Planning Application reference: NY/2011/0328/ENV

Dear Mr Robson

North Yorkshire Waste Action Group (NYWAG) is a pressure group of concerned residents. We have submitted a petition of over 10,000 signatories who oppose the AWRP proposal. We therefore represent a major body of opinion that wishes to see planning permission for AWRP refused.

When we submitted our initial objection letter on 11 November 2011 we intended to give you an early indication of the likely scope of our objection to AmeyCespa's application for the proposed AWRP. We now enclose the first batch of evidence which explains our objections in a number of areas – particularly harm. We emphasise that further objections will follow. **We object strongly to AmeyCespa's AWRP proposal and ask that you refuse planning permission. Reasons are given in the evidence herewith and below.**

Our original letter was an initial response to the official notice of the above planning application in order to meet the then 21 day deadline for objections and to reserve the right to make further comment and objection at a later date. We said then that this time limit was grossly unfair. Even the extended time limit is totally unreasonable given the massive size and complexity of the application. We therefore emphasise that the NYCC time limitation does not allow sufficient opportunity for citizens and councils to study and respond to the application in detail and again reserve the right to make further comment and objection at a later date.

Our initial objection was supported by several Annexes to give an indication of why we contend that planning permission should be refused. Naturally, these were drawn from earlier work but we felt that the arguments we presented in these Annexes were germane to the desirability of refusing planning permission. The purpose of this and later submissions is to present our detailed arguments for refusing planning permission.

We present herewith six chapters that focus on the harm that can be caused by environmental and health issues. These have been prepared by a team of highly experienced environmental specialists within our group. We challenge assertions made within the planning application and where possible we have cross referenced our comments with those of the applicant. This is best achieved by breaking this part of our objection into the 6 headings below.

1. Climate Change
2. Harmful Emissions and their Properties
3. Health Risks: Adverse Effects from Incinerator Emissions
4. Risks from Incinerator Ash
5. Air Quality and Health: A Critique of AmeyCespa's Assessment
6. Sustainability, What Sustainability

Each of these chapters offers a number of **reasons for refusing planning permission**. Together, they tackle many of the environmental issues and harm associated with AWRP and the EfW (incinerator) plant in particular. In addition to these issues there are a range of local impacts concerning, for example geology,

hydrology and ecology including impact on wildlife and agriculture which together will support the case for refusing planning permission. We expect to submit evidence in some of these areas at a later date.

There are many further reasons for asking you to refuse planning permission. Our later evidence will include, but will not be limited to, the following areas:

DEMAND FOR WASTE DISPOSAL / NEED STATEMENT
We accept the need to move away from landfill but AmeyCespa have neither made the case for a plant of the proposed capacity nor have they shown any need for their technical solution. We will therefore be refuting statements in their Planning Statement concerning capacity and technology choice. In particular, we contend **planning permission for the EfW (incineration plus electricity generation) should be refused.**

FINANCIAL AND COST FACTORS
The technical solution offered by AWRP is capital-intensive and front-end loaded and will impose unnecessarily high costs on the people of North Yorkshire. In particular, the proposal to include the EfW plant is not justified in economic or financial terms. We will argue that the existence of cheaper and cleaner alternatives which would employ more local people is a good reason for refusing planning permission for AWRP so that a better solution to avoiding landfill can be implemented. In part this is because all council tax payers will be adversely affected through unnecessarily high council tax bills and loss of services. **Planning permission should be refused**.

DESIGN
The site selection process appears not to have followed good practice (e.g. EfW plant with CHP are preferable, according to DEFRA) and may have been influenced by a wrong appreciation of the potential for recycling and by a lack of any appreciation of public perceptions concerning the acceptability of various technology options. The position of the AWRP site is wholly inconsistent with the localism policy, being at one corner of the county. Moreover, it is highly visually intrusive and out of place in a rural setting. **For these reasons, planning permission should be refused**

TRAFFIC
Traffic should be compared with a baseline in which the present landfill activities do not exist and the quarry has ceased production. This is because both are due to close early in the life of the proposed AWRP. We believe that traffic for AWRP will cause delays on East-West routes through added congestion, especially at peak periods and this carries an economic cost. We object to increased traffic, especially at critical points such as the A59/A168 junction as this increases accident risks. **This is a further reason for refusing planning permission.**

VISUAL IMPACT
The vast scale of the project and the 70m chimney with its associated massive plume will have major and wholly unacceptable visual impact and will be seen for miles around**. This alone is a good reason for refusing planning permission.**

We will send you details on these and other objections as soon as we are able. This will support the reasons given above for refusing planning permission and enumerate further reasons.

Yours sincerely

Steve Wright
Chairman, NYWAG